

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing,
Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

HMIS™

H HEALTH	2
F FLAMMABILITY	1
R REACTIVITY	0
PERSONAL PROTECTION NC 1503R © 1981 NIOSH	

SECTION I

MANUFACTURER'S NAME Chapman Chemical Company		EMERGENCY TELEPHONE NO. 901-396-5151
ADDRESS (Number, Street, City, State, and ZIP Code) 416 E. Brooks Rd., Memphis, Tennessee 38109		
CHEMICAL NAME AND SYNONYMS None	TRADE NAME AND SYNONYMS Permatox 10-S	
CHEMICAL FAMILY Sodium Pentachlorophenate - Mixture	FORMULA Formulation - proprietary	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)
Sodium Pentachlorophenate: Oral LD50 210 mg/kg rat					0.5 mg per M ³
Borax: Oral LD50 2100 mg/kg. mouse					

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)		SPECIFIC GRAVITY (H ₂ O=1)	
VAPOR PRESSURE (mm Hg.)	N/A	PERCENT, VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)		EVAPORATION RATE (_____ =1)	
SOLUBILITY IN WATER			
APPEARANCE AND ODOR			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	None	FLAMMABLE LIMITS	LeI	UeI
EXTINGUISHING MEDIA	No Fire hazard			
SPECIAL FIRE FIGHTING PROCEDURES				
UNUSUAL FIRE AND EXPLOSION HAZARDS				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

EFFECTS OF OVEREXPOSURE

Moderate to severe irritation to eyes, respiratory passages and skin; material can be absorbed through skin. Can cause dermatitis and affect nervous system and gastrointestinal tract.

EMERGENCY AND FIRST AID PROCEDURES

Remove to fresh air, keep quiet and warm. Flush eyes with water for 15 minutes, wash skin with soap and water. If swallowed, induce vomiting with warm water, continue until vomit fluid is clear. In all cases of internal and eye contact and other than very light respiratory and skin contact, call physician.

SECTION VI - REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID

STABLE

X

INCOMPATABILITY (Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS
POLYMERIZATION

MAY OCCUR

WILL NOT OCCUR

X

CONDITIONS TO AVOID

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Spread absorbent material such as sawdust or granular clay over area. After contact, scrub with soapy water if needed.

WASTE DISPOSAL METHOD

Bury in isolated landfill away from all water supplies.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

Dust respirator if one must enter dusty area.

VENTILATION

LOCAL EXHAUST

Sufficient to control dust to comfort level

MECHANICAL (General) (less than 0.5 mg/M³)

SPECIAL

OTHER

PROTECTIVE GLOVES

Yes

EYE PROTECTION

Yes -- Goggles

OTHER PROTECTIVE EQUIPMENT

To prevent bodily contact

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Prevent eye and skin contact. Do not breathe dust.

OTHER PRECAUTIONS

MATERIAL
SAFETY
DATA
SHEET

KOP-COAT, INC.

24 HOUR PRODUCT
EMERGENCY NUMBER : 800-548-0489
OUTSIDE U.S.A.: 412-227-2700

KOP-COAT, INC.
436 SEVENTH AVENUE
PITTSBURGH, PA 15219

CHEMTREC ASSISTANCE: 800-424-9300
CANUTEC: 613-996-6666

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: NP-1(R) Sapstain Control Chemical (Diluted RTU)

SYNONYM: None

PRODUCT USE: Wood preservative

CHEMICAL FAMILY:

FORMULA: Mixture

CAS NUMBER: None

DOT INFORMATION

APPLICABLE REGULATION : 49 CFR 171 - 179

U.S. POSTAL REGULATIONS : Shippable

DOT PROPER SHIPPING NAME: None

DOT HAZARD CLASS: None

LABEL: None

UN/NA NUMBER: None

LIMITED QUANTITY: No

SECTION II - HEALTH/SAFETY ALERT

CAUTION
MAY CAUSE IRRITATION TO SKIN AND EYES
AVOID PROLONGED AND/OR REPEATED CONTACT
OBSERVE GOOD HYGIENE AND SAFETY PRACTICES WHEN HANDLING THIS PRODUCT
DO NOT USE THIS PRODUCT UNTIL MSDS HAS BEEN READ AND UNDERSTOOD

SECTION III - HEALTH HAZARD INFORMATION

EYE: Contact with liquid or mists may cause irritation.

SKIN: Repeated and/or prolonged contact with the skin may cause irritation.

INHALATION: Not anticipated to cause adverse effects. However, in sensitive individuals, repeated and/or prolonged inhalation of high concentrations of mists may cause respiratory tract irritation.

INGESTION: May cause gastrointestinal disturbances.

REVISION DATE: 01/91
SPECIFICATION SHEET NUMBER:
COMMODITY NUMBER: 00000000

CODE NUMBER: WPR00046JA9104
REPLACES SHEET: WPR00046JL900

SUPPLIER INFORMATION: Same as manufacturer.

SECTION IV - EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT: Immediately flush with large amounts of water for 15 minutes. Seek medical aid.

SKIN CONTACT: Wash thoroughly with soap and water. If irritation persists, seek medical aid.

INHALATION: Remove from exposure. If breathing has stopped or is difficult, administer artificial respiration or oxygen as indicated. Seek medical aid.

INGESTION: Give 1 to 2 glasses of milk or water to victim if conscious and alert. Induce vomiting OR give 1 to 2 oz (30 to 60g) activated charcoal in water to victim if conscious and alert. Seek medical aid. DO NOT ATTEMPT TO GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

NOTE TO PHYSICIAN: There is no specific antidote for effects from overexposure to this material. Treatment should be directed at the control of symptoms and the clinical condition.

SECTION V - FIRE AND EXPLOSION HAZARD INFORMATION

FLASH PT. & METHOD: NA

AUTOIGNITION TEMP: Not applicable

FLAMMABLE LIMITS (% BY VOLUME/AIR):
LOWER: Not applicable

UPPER: Not applicable

EXTINGUISHING MEDIA: Not applicable.

FIRE-FIGHTING PROCEDURES: Wear complete fire service protective equipment, including full-face MSHA/NIOSH approved self-contained breathing apparatus. Use water to cool fire-exposed container/structure/protect personnel.

FIRE AND EXPLOSION HAZARDS: When heated (fire conditions), vapors/decomposition products may be released forming flammable/explosive mixtures in air. Closed containers may explode when exposed to extreme heat (fire).

SENSITIVITY TO MECHANICAL IMPACT: No information found

SENSITIVITY TO STATIC DISCHARGE: No information found

SECTION VI - SPILL, LEAK AND DISPOSAL INFORMATION

SPILL OR LEAK PROCEDURES (PRODUCT): Stop leak if no risk involved. Stay upwind. Small spills: Spread absorbents. Shovel absorbed material into container. Large Spills: Dike and contain spill. Pump to storage or salvage vessels. Contain runoff from fire control and dilution water. Prevent run-off to sewers, streams or other bodies of water. If run-off occurs, notify proper authorities that a spill has occurred.

WASTE DISPOSAL: This product does not have any US EPA defined hazardous waste characteristics or have any US EPA defined hazardous substances. Dispose of in accordance with local, state, and federal regulations.

SECTION VII - RECOMMENDED EXPOSURE LIMIT/HAZARDOUS INGREDIENTS

EXPOSURE LIMIT (PRODUCT): None established.

----- SARA TITLE III SECTION 313 CHEMICALS -----
(SEE SECTION VII FOR CAS NUMBERS AND PERCENTAGES)

None

SECTION VIII - PERSONAL PROTECTION INFORMATION

EYE PROTECTION: Industrial safety glasses, minimum. As necessary to comply with 29 CFR 1910.133 and work area conditions: use side shields, goggles or face shield.

SKIN PROTECTION: As required, industrial resistant flexible-type gloves (rubber, neoprene, PVC or equal - See SECTION XII - COMMENTS). Wear industrial-type work clothing and safety footwear. Depending on working conditions, i.e., contact potential, wear impervious protective garments such as head/neck cover, aprons, jackets, pants, coveralls, boots, etc.

RESPIRATORY PROTECTION: Not required under normal use conditions. Use a cartridge respirator if the area is not ventilated.

VENTILATION: Not normally required. Provide sufficient general/local exhaust ventilation in pattern/volume to control inhalation exposures below current exposure limits

SECTION IX - PERSONAL HANDLING INSTRUCTIONS

HANDLING: Avoid prolonged or repeated breathing of vapors, mists or fumes. Avoid prolonged or repeated contact with skin or eyes. Observe good personal hygiene practices and recommended procedures.

STORAGE: Keep in a closed, labeled container within a cool (well shaded), dry, ventilated area. Protect from physical damage. Keep containers closed when material is not in use. Maintain good housekeeping.

OTHER: Not for use or storage in or around the home. DO NOT TAKE INTERNALLY. Do not use until manufacturer's precautions have been read/understood. Wash exposed areas promptly and thoroughly after skin contact and before eating, drinking, using tobacco products or rest rooms.

SECTION X - REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: None

INCOMPATIBILITY: None known

HAZARDOUS REACTIONS/DECOMPOSITION/COMBUSTION PRODUCTS: None

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: None

SECTION XI - PHYSICAL DATA

BOILING POINT: 212-220 F

SPEC. GRAV. OR WT/GAL : Similar to water

MELTING POINT: Not applicable

% VOLATILE BY VOL: 75-99%

VAPOR PRESSURE: Similar to water

EVAPORATION RATE(ETHER=1): <1

VAPOR DENSITY(AIR=1): >1

VISCOSITY: Similar to water

SOLUBILITY
(WATER): miscible

pH: 7.9 (10%)

VOC: Not applicable

COEFFICIENT OF WATER/OIL DISTRIBUTION: No information found

FREEZING POINT: 0 C (32 F)

APPEARANCE/ODOR: Off-white liquid with a weak fatty odor

SECTION XII - COMMENTS

No known ingredients which occur at greater than 0.1% are listed as a carcinogen in the IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans, the NTP Annual Report on Carcinogens or OSHA 29 CFR 1910.1001-1047 subpart Z Toxic and Hazardous Substances (Specifically Regulated Substances).

SKIN PROTECTION (protective material): Permeation/degradation values of chemical mixtures cannot be predicted from pure components or chemical classes. Thus, these materials are normally best estimates based on available pure component data. A significant difference in chemical breakthrough time has been reported for generically similar gloves from different manufacturers (AIHA J., 48, 941-947 1987).

Do not use until manufacturer's precautions have been read/understood. Wash exposed areas promptly and thoroughly after skin contact from working with this product and before eating, drinking, using tobacco products or rest rooms. Do not wear contact lens without proper eye protection when using this product.

Prepared By: Occupational Health and Product Safety Department - C.A.Hope

NOTICE: While the information and recommendations set forth herein are believed to be accurate as of the date hereof, Kop-Coat, Inc. makes no warranty with respect thereto and disclaims all liability from reliance thereon.

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ENVIRONMENTAL AND SAFETY PERSPECTIVE

NP-1 was designed to be both relatively safe and biodegradable. On wood, NP-1 resists degradation and is extremely durable. Even in contact with soil NP-1 treated wood resists degradation.

Unlike products that contain heavy metals like zinc and copper there is no indication that the active ingredients in NP-1 will accumulate in the environment. Details on biodegradability are included in Environmental Aspects Section.

NP-1 concentrate contains two highly effective and relatively safe preservatives. The one active ingredient, 3-Iodo-2-propynyl-butyl carbamate (IPBC) is a common household paint mildewcide. The other active ingredient, didecyldimethyl ammonium chloride (quaternary) is commonly used in the following applications:

- General - Hospital disinfection
- Sanitizing
- Water treatment/cooling towers
- Laundry mildew preventative
- Bacteriostat/preservative/fungicide

Details on safety are included in the section on Toxicology and Safety Aspects.

While this unique product was developed to minimize the effects of potential worker and environmental exposure, certain product industrial hygiene and common sense precautions should be followed to ensure that this product, like all pesticides or industrial chemicals, will perform its intended function while minimizing risks. To this end the label as well as the Material Safety Data Sheets for both the concentrate and diluted ready-to-use formulations contain important guidelines for the user to follow. Please review the copies of this literature that are included in this manual.

ENVIRONMENTAL ASPECTS

Biodegradation

The biodegradability or environmental fate of each of the active ingredient components in NP-1 has been investigated and previously reported (1, 2, 3, 4, 5). Based on these results, both components, in levels slightly lower than those found in the use dilutions, degrade in a matter of days or weeks for quaternaries to perhaps weeks or months for IPBC. There is no indication of cumulative toxicity as found with "persistent" actives (e.g. phenolics and heavy metal compounds).

In one study the biodegradabilities of four different quaternaries were determined using a mixed culture obtained from soil and sewage. Although the structures of the quaternaries influenced biodegradation rates, each quaternary tested was completely degraded within 48 hours. Under the same conditions penta degraded only 20%. Aliphatic quaternaries, such as in NP-1, tested were more rapidly biodegraded than aromatic quaternaries. Biodegradation of the quaternaries occurred in the presence and absence of other organic matter. The study indicates that the quaternaries studied are subject to relatively rapid biodegradation following application of 200-700 ppm concentrations and subsequent dilution to lower concentrations, ie. 10-100 ppm (2).

Biodegradation of IPBC has been demonstrated by means of the guppy bioassay and a detoxification is proposed which results in biotransformation of the biocide by means of a hydrolytic decarbamylation:

Hydrolytic decarbamylation of Carbamate has been shown to occur when these compounds are incubated in soil (3). In the absence of micro-organisms and compounds which support microbial growth, IPBC has been shown to be hydrolytically stable (5). Biodegradability tests to standard specification (4) undertaken with activated sludge of defined composition (consisting of mixture of activated sludge from city disposal plants and from a river, lake sea or marsh) have shown that solutions of IPBC are degraded within a limited time. Residues are detected and measured by HPLC (High Performance Liquid Chromatography) (5).

The most prominent feature of the fate of carbamate biocides in soil is their decreased persistence as toxic molecules as compared with chlorinated hydrocarbon biocides. The effective life of carbamate biocides in soil is usually weeks and months compared with months and years of chlorinated hydrocarbon biocides (3). Alkylamidase from *Fusarium oxysporium* is found to have any enzyme activity of 67 nmol carbamate transformed/min/mg protein. The microbial metabolism of the carbamates seems to be the most important factor in accounting for their degradation in soil, whereas the reductive and/or oxidative reactions which could occur before any hydrolytic cleavage is possible are likely to be of minimal importance (1).

References

1. Chakrabarty, A. M.: Biodegradation and Detoxification of Environmental Pollutants.
ISBN 0-8493-5524-9 (1982)
2. Gowel, L.G., and Hudelleston, R. L. (1972) - The Biodegradability of Low Concentrations of Certain Quaternary Ammonium Antimicrobials by Bacteria.
3. Labeglia, J. and Dahm, Paul A.: Degradation of Organophosphorus and Carbamate Insecticides in the Soil and by Soil Micro-organisms.
Ann. Rev. Entomol. 1977 22:483-513
4. OECD Guideline for testing of Chemicals.
"Inherent Biodegradability: Modified MITI test (II)" May 1981 -302C
5. Biodegradability test of 3-iodo-2-propynyl butyl carbamate. Test report No. 35747, April 2, 1985.

Toxicity to Fish

While quaternaries are considered to degrade rapidly, IPBC, like many carbamates, is toxic to fish in very small concentrations, (i.e., 5-19 ppm); therefore, extreme care should be taken to prevent even the diluted product from directly entering lakes, streams, rivers or other bodies of water.

Environmental Control Measures

As a prudent measure to minimize ground or water contamination, a simple drip pad or catch pan should be constructed to catch any splashes during application or drips from freshly treated material, as well as control any run-off water. The collected diluted use product can then be returned to the dip or spray system with very little contamination hazard. To prevent over-dilution or run-off, construction of a roof over the dipping area and/or temporary holding area for freshly treated products will suffice. After treatment primary drippage from wood should be complete from twenty minutes to one hour. Incidental drippage on the storage or drying yard would not be of concern.

Disposal of Concentrate Wastes

NP-1 is not listed as a hazardous waste. However, the concentrated product (i.e. undiluted form as received from Kop-Coat) does have a flashpoint of approximately 104°F, which meets the RCRA definition of an ignitable waste. If waste is to be disposed of in this form all Federal, state and local requirements regarding hazardous waste disposal must be followed. Contact Kop-Coat, Inc. personnel for assistance. Do not incinerate liquid concentrate except in accordance with Federal, state and local regulations.

Disposal of Diluted Wastes

In many instances it may be necessary to dispose of used diluted products by means of discharge to a POTW sewage system. It is recommended that all Federal, state and local regulations be followed if this method is chosen. Check with the local sewage treatment plant to determine if the treatment system has the capabilities to process such waste. Contact Kop-Coat personnel for assistance.

Disposal of Treated Wood Wastes

Sawdust of chips generated from wood treated with NP-1 do not exhibit characteristics that would require any special handling requirements other than those for untreated wood.

Occasional cleanout of the dip tank or other treating equipment may yield contaminated sawdust and debris. This material may be disposed of in a sanitary landfill according to state and local requirements. Possible leakage of any chemical residues will be subject to biodegradation. While landfilling is one method of disposal subject to the abovementioned state and local requirements, incineration of such waste is a more acceptable method of disposal. Possible decomposition products include trace amounts of carbon monoxide, carbon dioxide, ammonia, nitrous oxide and iodine. Do not incinerate closed containers. Do not incinerate NP-1 liquid concentrate except in accordance with Federal, state and local regulations. Other contaminated articles, i.e. clothing, may be disposed of via ordinary trash disposal or other approved means according to state and local requirements.

General Precautions

All pesticides, including all wood preservatives, contain a certain degree of toxicity as is needed to protect against undesirable organism attack. There is no pesticide that is "non-toxic." As you can derive from the preceding table, the data for the concentrated form of NP-1 (as well as the pure active ingredients) suggests more caution when handling, relative to the diluted use treating formulation. However, it is recommended that protective clothing requirements still be observed as a prudent industrial hygiene measure when working with any pesticide regardless of dilution. Further, it is an EPA requirement that all pesticide labels bear certain precautionary statements and that these precautions be followed to protect human health and the environment. Almost every pesticide label, including that for household bleach and disinfectants contains standard precautionary wording for the user.

Recommended Safe Handling Procedures

Those workers involved in the actual treatment of the wood or handling of wet or dripping wood dripping wood treated with NP-1, and thus potentially exposed to the preservative, should wear rubber shoes, a rubber apron, protective (rubber) boots and some form of approved eye protection, particularly if splashing is likely. The treating solution should be washed off the skin after exposure; eyes should be flushed immediately for fifteen minutes.

It is recommended that work clothes be provided for the dip tank operator (or other personnel involved directly in the treating of wood), and laundered commercially. Contaminated work clothes, including gloves and boots, should not be taken home and allowed to mix with household laundry. Wash work clothes separately.

Treated wood can be handled without gloves after initial post treatment dripping has stopped and no visible solution residue remains on the wood surface. However, we recommend wearing shoes to protect from splinters. If exposed to NP-1, wash hands before eating, drinking, or use of tobacco products or restroom facilities.

The above recommendations, if followed, are believed to represent the best precaution against misuse of the pesticide and potential harm to the worker of the environment.

It is, and will remain, the position of Kop-Coat, Inc. that all above suggestions and/or recommendations should be followed for maximum safety and protection of human health and the environment. Contact Kop-Coat, Inc. personnel for further information or assistance.

TOXICOLOGICAL AND SAFETY ASPECTS

Toxicity

The toxicity of NP-1 is of the same order of magnitude as commercial quaternaries used as hospital disinfectants. To compare toxicological properties among NP-1, the active ingredients and the diluted ready-to-use product form, refer to the table below and the Material Safety Data Sheets provided in this manual.

	<u>NP-1</u>	<u>IPBC (100%)</u>	<u>Dimethyl Ammonium Chloride (100%)</u>	<u>Diluted, Ready to Use NP-1 Formulation</u>
Oral LD ₅₀	400 mg/kg	1470 mg/kg	450 mg/kg	
Acute dermal LD ₅₀	1404 mg/kg	>2000 mg/kg	4300 mg/kg	
Skin irritation	corrosive	not a primary skin irritant	primary skin irritant	slight irritant
Eye irritation	corrosive	corrosive- reversible	primary eye irritant	slight irritant
Inhalation (Aerosol Mist)	<0.20 mg/L	>6.89 mg/L	not available	
Mutagenicity*	not a mutagen	not a mutagen	not a mutagen	not a mutagen
90-day Feeding	not available	no effect on cholinesterase level**		

* Data indicates that NP-1 does not possess chronic toxicity properties.

** This is important because some carbamate pesticides are known to inhibit cholinesterase in animals.

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9/14/90

Facility ID: 1820102 Facility Name: CORTRIM HARDWOOD PARTS CO

I. Ownership of Tank(s)

Owner ID: 02200

Alt. ID: 2200

Name: CORTRIM HARDWOOD PARTS CO

Street: 1320 GEORGIA AVE

City: Bristol

County: Sullivan

State: TN

ZIP: 37620 -

Phone: (615) 746-6127

Fax:

Contact: (if other than Owner)

Taxpayer ID:

S.S. No:

Comments:

Type of Notification

New: ☐

Amended: ☒

Closure: ☐

Facility ID: 1820102

Alt. ID: 1-82-0102

Date Received: 21 Sep 1989

Facility Operator:

Last

First

II. Location of Tank(s)

Name: CORTRIM HARDWOOD PARTS CO

Street: 1320 GEORGIA AVE

City: Bristol

County: Sullivan

State: TN

ZIP: 37620 -

Latitude: ° ' "

Longitude: ° ' "

Phone:

Comments:

Fund Ineligible: X
Fund Date: 07/01/94

III. Type of Owner

Private

IV. Indian Lands

Indian Lands: ☐ Tanks are located on land within an Indian Reservation or on other trust lands.

Tribe Owned: ☐ Tanks are owned by native American nation or tribe.

Tribe:

Facility ID: 1820102

Facility Name: CORTRIM HARDWOOD PARTS CO

V. Type of Facility

Describe the kind of facility:

Not Listed

Comments:

VI. Contact Persons in Charge of Tanks

Name: SPIEGLE JR, ROBERT

Address: 1320 GEORGIA AVE, Bristol, TN 37620

Phone: (615) 746-6127

Fax:

Contact Type: ☐ Owner ☐ Operator ☐ CA Contact ☐ Manager ☐ Outreach ☐ Location Contact
☐ RP ☐ Fee Contact ☒ Other OWNER/ENGIN

VII. Financial Responsibility

Facility meets financial responsibility requirements: ☐

Check all that apply:

Self-Insured: ☐

Letter of Credit: ☐

Comments:

Insurance: ☐

State Fund: ☐

Risk Retention Group: ☐

Trust Fund: ☐

Guarantee: ☐

Other: ☐

Surety Bond: ☐

Not Listed: ☐

VIII. Certification

Name: THOMAS B GREEN JR

Title: EMPE

Date: 14 Sep 1990

Facility ID: 1820102

Facility Name: CORTRIM HARDWOOD PARTS CO

Latitude: ° ' " "

Longitude: ° ' " "

IX. Description of Underground Storage Tanks

1. Status of Tank

Federally Regulated: ☒

Compartment: ☐

AST: ☐

Amended Information: ☒

Manifested: ☐

No Fee: ☐

Facility ID: 1820102

Tank ID: 005

Tank Status: Currently in Use

Comments:

Rcvd:

Alt Tank ID: 5

2. Date of Installation (month/year)

3. Estimated Total Capacity (gallons)

Date Installed: Sep 1973

Tank Capacity: 7,200

4. Material of Construction

Enter material of construction for the tank. You may supplement primary description with one of the Secondary Options.

Tank Material: Asphalt Coated or Bare Steel

Comments:

Sec. Tank Option: None

Check if tank has been repaired: ☐

5. Piping (Material)

Enter material of construction for the piping. You may supplement primary description with one of the Secondary Options.

Piping Material: Other

Comments: NONE

Sec. Piping Option: None

6. Piping (Type)

Type of Pipe: Not Listed

Check if piping has been repaired: ☐

7. Substance Currently or Last Stored in Greatest Quantity by Volume

Substance: Hazardous Substance

Comments:

CERCLA No.:

Description:

Facility ID: 1820102

Facility Name: CORTRIM HARDWOOD PARTS CO

X. Tanks Out of Use, or Change in Service

1. Closing of Tank

NOTE: This section not available unless tank status at top of form is set to a form of closure.

Date Last Used:

Closure Status:

Date Closure Rcvd.:

Inert Fill:

Date Closed:

2. Site Assessment

Site Assessment Completed: ☐

Evidence of a Leak Detected: ☐

XI. Certification of Compliance

1. Installation

Installer certified by tank & piping manufacturer: ☐

Manufacturer's installation checklists have been completed: ☐

Installer certified or licensed by implementing agency: ☐

Another method allowed by State agency: ☐

Installation inspected by registered engineer: ☐

Comments:

Installation inspected & approved by implementing agency: ☐

2. Release Detection

	Tank/Pipe	
Manual tank gauging:	<input type="checkbox"/>	<input type="checkbox"/>
Tank tightness testing:	<input type="checkbox"/>	<input type="checkbox"/>
Inventory control:	<input type="checkbox"/>	<input type="checkbox"/>
Automatic tank gauging:	<input type="checkbox"/>	<input type="checkbox"/>
Vapor monitoring:	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater monitoring:	<input type="checkbox"/>	<input type="checkbox"/>
SIR:	<input type="checkbox"/>	<input type="checkbox"/>
Interstit. Dbl-wall Monitor:	<input type="checkbox"/>	<input type="checkbox"/>
Interstit. Sec. Con. Monitor:	<input type="checkbox"/>	<input type="checkbox"/>

	Tank/Pipe	
Auto line leak detector:	<input type="checkbox"/>	<input type="checkbox"/>
Line tightness testing:	<input type="checkbox"/>	<input type="checkbox"/>
Other method:	<input type="checkbox"/>	<input type="checkbox"/>
Deferred:	<input type="checkbox"/>	<input type="checkbox"/>
Not listed:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

3. Spill, Overfill, and Corrosion Protection

Overfill Protected: ☐

Spill Protected: ☐

CP Met on Tank & Piping: ☐

Installer Oath:

Name:

Company:

Position:

Date Signed:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

December 12, 1990

CORTRIM HARDWOOD PARTS CO
1320 GEORGIA AVE
BRISTOL, TN 37620

Dear UST Facility Owner:

The State of Tennessee's underground storage tank notification records show you own one or more hazardous substance underground storage tanks (USTs). Leak detection is required for any pressurized piping associated with these tanks by December 22, 1990. The leak detection options are discussed in the Environmental Protection Agency (EPA) publication titled "Musts for USTs" and also the federal regulations governing USTs, 40 CFR Part 280, Subpart D. Enclosed are photocopies of two pages from "Musts for USTs" displaying the requirements and deadlines.

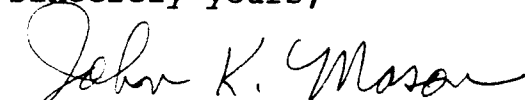
EPA is the implementing agency for the hazardous substance UST program in the State of Tennessee. This letter is to remind you of your obligation to comply with the December 22, 1990, leak detection deadline for pressurized piping. You may expect to receive correspondence from EPA after December 22, 1990, requesting documentation of your compliance status.

If there are changes in the status of your USTs, you must file an amended Notification Form (EPA Form 7530-1). The amended form should be submitted to the Tennessee Department of Health and Environment, Division of Underground Storage Tanks, 200 Doctor's Building, 706 Church Street, Nashville, Tennessee 37247-4101 and a copy sent to EPA. Two notification forms are enclosed for your use, if needed.

-2-

If you have any questions, please contact Helen Lunsford of my staff at (404) 347-3866.

Sincerely yours,

A handwritten signature in cursive script that reads "John K. Mason". The signature is written in dark ink and is positioned above the typed name.

John K. Mason, Chief
Underground Storage Tank Section

Enclosures

cc: Chuck Head, Director
TN Division of Underground Storage Tanks

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4

Westinghouse Environmental
and Geotechnical Services, Inc.



P.O. Box 1118 TCAS
2153 Highway 75
Blountville, Tennessee 37617
(615) 323-2101
Fax (615) 323-5272

December 20, 1991

United States Environmental Protection Agency
Region IV
345 Cortland Street, N.E.
Atlanta, Georgia 30365

Attention: Ms. Helen Lunsford

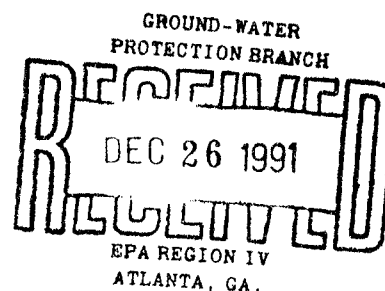
Subject: Hazardous Substance UST
Cortrim Hardwood Parts Company
Bristol, Tennessee

Dear Ms. Lunsford:

On behalf of Cortrim Hardwood Parts Company, we request an extension of the leak detection deadline of December 22, 1991 for their currently regulated Hazardous Substance UST. Their UST is an open-top, steel dip tank which was entered into service in 1973 and contains a liquid with dissolved Sodium Pentachlorophenate and Borax. Conventional methods of leak detection and inventory control are not applicable due to a variety of physical and regulatory constraints. Cortrim desires to:

- 1). develop for your review other methods of leak detection in accordance with 40 CFR 280.43 [h] -or-
- 2). immediately retrofit the tank to incorporate secondary containment and leak detection if other methods are not economically or technically feasible.

The "other methods" of leak detection program may incorporate precision level measurements at regular intervals and controlled-condition compensation for precipitation and/or evaporation. Alternatively, the leak detection program may consist of product removal followed by vacuum leak testing of all welds and seams plus thickness confirmation of walls by ultrasonic methods. Cortrim proposes to complete work on the following schedule:




United States Environmental Protection Agency
December 20, 1991
Page Two

<u>ITEM</u>	<u>COMPLETION DATE</u>
Submit description of "Other Methods"	1/10/92
Approval of "other method"	A
Begin leak detection by "other methods"	30 days after A
- or -	
Begin tank retrofit	60 days after A
Complete tank retrofit	130 days after A

Should you have any questions regarding this communication or if we may clarify any of the details, please contact the writer.

Very truly yours,

WESTINGHOUSE ENVIRONMENTAL AND
GEOTECHNICAL SERVICES, INC.


James J. Belgeri, P.E.
Senior Geotechnical Engineer

JJB/dae/3

cc: Mr. Robert D. Spiegle, Jr., Cortrim



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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

900 NORTH STATE OF FRANKLIN ROAD
JOHNSON CITY, TENNESSEE 37604

March 24, 1992

Mr. Robert D. Spiegle, Jr.
Engineer
Hardwood Parts Company
P. O. Box 919
Bristol, Tennessee 37621

RE: UST Closure
Hardwood Parts Company
Facility ID# 1-820102

Dear Mr. Spiegle:

The Tennessee Division of Underground Storage Tanks has received the results from the analyses of soil samples collected during the above referenced petroleum underground storage tank system closure. Upon review, it appears that all the analytical results document that the concentrations of benzene, toluene, and xylene (BTX) and total petroleum hydrocarbons (TPH) in the remaining soil are below the regulatory clean-up levels. Additionally, the Division of Solid Waste Management (DSWM) has evaluated the results from the analyses of contaminated soils which have been treated on-site. Enclosed please find a memo from Mr. John Trimmer of the DSWM concerning the deposition of the treated soil. Based on the above referred analytical data, three (3) gasoline tanks can be considered closed at this location. Consequently, the Division does not see the necessity for further investigation, clean-up, or enforcement but will reserve the right to initiate additional action should a problem become apparent in the future.

Mr. Robert D. Spiegle, Jr.
March 24, 1992
Page 2

If you have any questions or comments, please call me at 615/928-6487.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard A. Whitson", is written over the typed name.

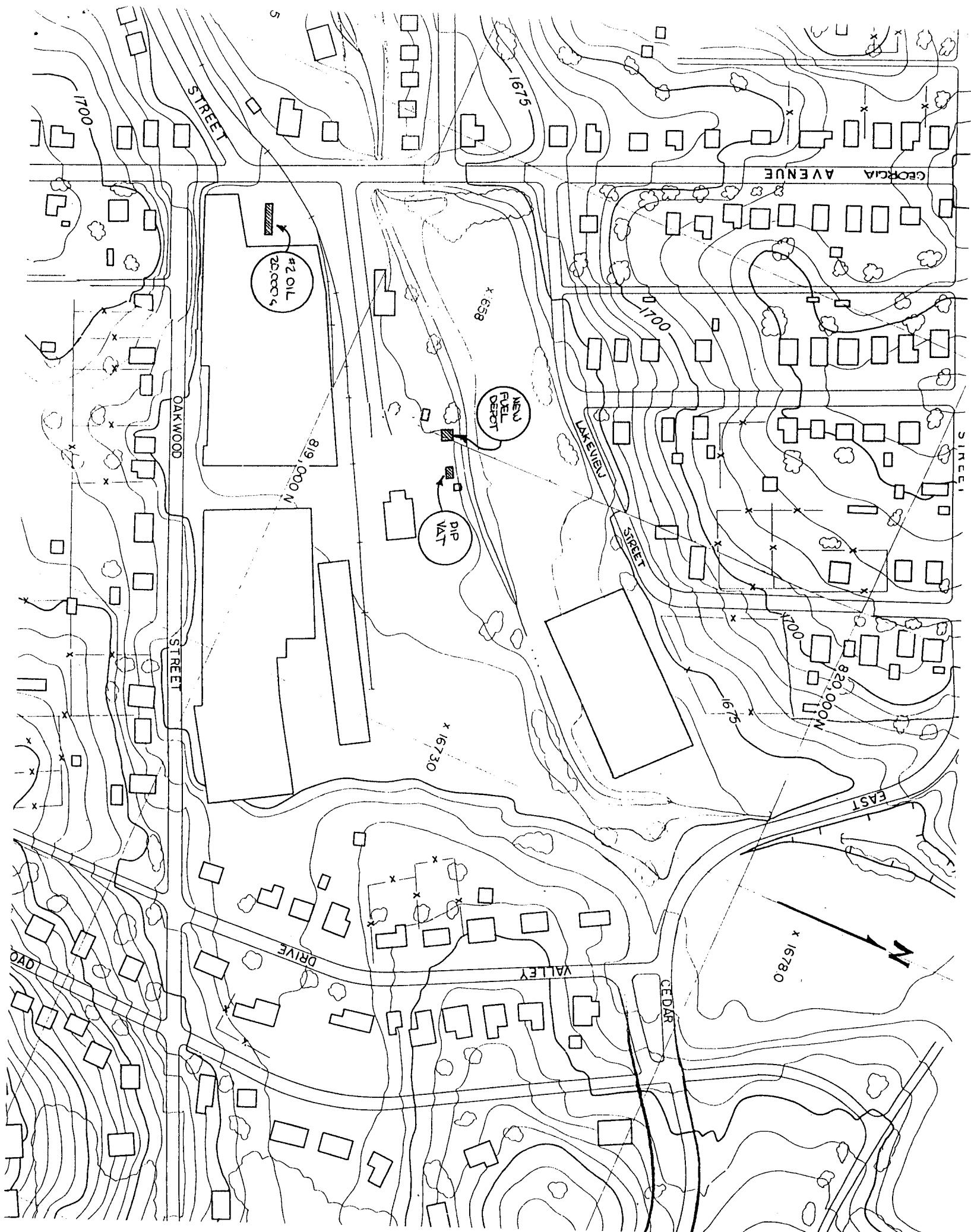
Richard A. Whitson
Environmental Engineer
Division of Underground Storage Tanks

RAW/13022084

UST-18

Enclosure

cc: Nashville File
Closure File 1-820103



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6

6/19/92
9,500 51/
permatex
Cortrim. LLC

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ref: 4WM-GP

CORTRIM HARDWOOD PARTS CO
1320 GEORGIA AVE
BRISTOL, TN 37620

RE: Request for Information Pursuant to Section 9005(a) of RCRA

Dear UST Owner/Operator:

Regulations governing hazardous substance underground storage tanks (USTs) are set forth in 40 Code of Federal Regulation Part 280 and are implemented by local, state, and federal agencies. A State program may be approved by the Environmental Protection Agency (EPA) if the State demonstrates that its program meets all of the Agency's statutory requirements. The role of implementing agency has not been accepted by Tennessee and is, therefore, administered by the EPA Region IV. The Tennessee Department of Environment and Conservation does not have authority to enforce technical requirements for maintaining hazardous substance USTs.

Therefore, the EPA is requesting information concerning your UST management procedures at all facilities located in Tennessee. Pursuant to the authority of Section 9005 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6991d, you are hereby required to submit the following information to EPA within fifteen (15) days of receipt of this letter:

1. List the following information for each hazardous substance tank system:
 - a. Location - Provide the physical orientation of the tank system on each property;
 - b. Age - Provide the age of the tank or tank system;
 - c. Type - Provide the type of piping for the tank system (pressurized or suction);

- d. Size - Provide the size of the tank;
 - e. Contents - Provide the type(s) of materials stored in each tank; and
 - f. Status - Identify whether the tank system currently is being used, is inactive or closed.
2. For each tank system listed in your answer to Question 1 which was installed in 1974 or earlier or after December 22, 1988:
- a. List the type of release detection used for each tank;
 - b. Supply documentation of the release detection and its results listed in answer to Question 2a. Such documentation may include copies of invoices for services rendered, testing and monitoring procedures and results, or inventory control records. Inventory control records must cover the most recent two (2) month period and be reconciled to show a net loss or gain for each month;
 - c. List the type of release detection of any and all associated piping of systems containing regulated substances;
 - d. Supply documentation of release detection and its results listed in answer to Question 2c;
 - e. For systems with suction piping, list the number and location of the check valve(s) in the tank piping system (e.g., at the pump or at the top of the tank); and
 - f. For systems with pressurized piping, state whether an automatic line leak detector has been installed. State the type of automatic line leak detector used, and the year of installation, if known.
3. For each tank system listed in your answer to Question 1 which was installed after 1974, but before December 22, 1988 and has pressurized piping:
- a. List the type of release detection used for the pressurized piping;
 - b. State whether an automatic line leak detector has been installed. State the type of automatic line leak detector used, and the year of installation, if known; and

- c. Supply documentation of the release detection and its results listed in answer to Question 3a. Such documentation may include copies of invoices for services rendered, and testing and monitoring procedures and results.

To aid the organization and clarity of your response, please assign a number to each tank or tank system referenced.

Failure to respond to each and every request herein within fifteen (15) days of receipt of this letter may result in the initiation of an enforcement action by EPA pursuant to Section 9006 of RCRA, 42 U.S.C. §6991e, under which EPA may seek the imposition of penalties of up to \$25,000 for each day of continued noncompliance.

Any notice, report, certification, data presentation, or other document submitted to EPA which discusses, describes, demonstrates, supports any finding or makes any representation concerning compliance or non-compliance shall be certified by a responsible corporate officer.

All information should be submitted to Mr. John Mason, Chief, Underground Storage Tank Section, at the above address. If you have any questions, please contact J. Scott Gordon or Donna Seadler, of my staff, at (404) 347-3866.

Sincerely yours,

Beverly E. Houston, Chief
Ground-water Protection Branch
Water Management Division

JSG
GORDON
6/15/92

JM 6/15
MASON

BH 6/15
HOUSTON

	UST Certified Mailing		
	Response Checklist		
	Info	Info	
	Prov.	Negl.	
	----	----	-----
QUEST #1			
a. Location	x		
b. Age of Tank	x		1973
c. Type Piping	x		none
d. Size	x		9,500 gal
e. contents	x		permatox
f. status	x		in use
QUEST #2 (>1974 or <1988)			
a. tank leak detection	x		tightness testing every three years
b. doc. of detection	x		
c. pipe leak detection	n/a		
d. doc. of detection	n/a		
e.if suction piping			
location of check valves	n/a		
f. if pressure piping			
1. line leak detector	n/a		
2. type leak detector	n/a		
3. year installed	n/a		
QUEST #3 (1974-1988)			
a. type leak detection	n/a		
pressure piping	n/a		
b. doc. leak detection	n/a		
c. whether auto line leak	n/a		
detector	n/a		
1. type	n/a		
2. year	n/a		
COMMENTS:	Needs some type of monthly monitoring		

	UST Certified Mailing		
	Response Checklist		
	Info	Info	
	Prov.	Negl.	
	-----	-----	-----
QUEST #1			
a. Location	x		
b. Age of Tank	x		1973
c. Type Piping	x		none
d. Size	x		9,500 gal
e. contents	x		permatox
f. status	x		in use
QUEST #2 (>1974 or <1988)			
a. tank leak detection	x		tightness testing every three years
b. doc. of detection	x		
c. pipe leak detection	n/a		
d. doc. of detection	n/a		
e. if suction piping			
location of check valves	n/a		
f. if pressure piping			
1. line leak detector	n/a		
2. type leak detector	n/a		
3. year installed	n/a		
	Cortrim		

- d. Size - Provide the size of the tank;
 - e. Contents - Provide the type(s) of materials stored in each tank; and
 - f. Status - Identify whether the tank system currently is being used, is inactive or closed.
2. For each tank system listed in your answer to Question 1 which was installed in 1974 or earlier or after December 22, 1988:
- a. List the type of release detection used for each tank;
 - b. Supply documentation of the release detection and its results listed in answer to Question 2a. Such documentation may include copies of invoices for services rendered, testing and monitoring procedures and results, or inventory control records. Inventory control records must cover the most recent two (2) month period and be reconciled to show a net loss or gain for each month;
 - c. List the type of release detection of any and all associated piping of systems containing regulated substances;
 - d. Supply documentation of release detection and its results listed in answer to Question 2c;
 - e. For systems with suction piping, list the number and location of the check valve(s) in the tank piping system (e.g., at the pump or at the top of the tank); and
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- a. List the type of release detection used for the pressurized piping;
 - b. State whether an automatic line leak detector has been installed. State the type of automatic line leak detector used, and the year of installation, if known; and

- c. Supply documentation of the release detection and its results listed in answer to Question 3a. Such documentation may include copies of invoices for services rendered, and testing and monitoring procedures and results.

To aid the organization and clarity of your response, please assign a number to each tank or tank system referenced.

Failure to respond to each and every request herein within fifteen (15) days of receipt of this letter may result in the initiation of an enforcement action by EPA pursuant to Section 9006 of RCRA, 42 U.S.C. §6991e, under which EPA may seek the imposition of penalties of up to \$25,000 for each day of continued noncompliance.

Any notice, report, certification, data presentation, or other document submitted to EPA which discusses, describes, demonstrates, supports any finding or makes any representation concerning compliance or non-compliance shall be certified by a responsible corporate officer.

All information should be submitted to Mr. John Mason, Chief, Underground Storage Tank Section, at the above address. If you have any questions, please contact J. Scott Gordon or Donna Seadler, of my staff, at (404) 347-3866.

Sincerely yours,

Beverly E. Houston, Chief
Ground-water Protection Branch
Water Management Division

<u>JSG</u> GORDON 6/15/92	<u>JM 6/15</u> MASON	<u>BH 6/15</u> HOUSTON
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	UST Certified Mailing		
	Response Checklist		
	Info	Info	
	Prov.	Negl.	
	-----	-----	-----
QUEST #1			
a. Location	x		
b. Age of Tank	x		1973
c. Type Piping	x		none
d. Size	x		9,500 gal
e. contents	x		permatox
f. status	x		in use
QUEST #2 (>1974 or <1988)			
a. tank leak detection	x		tightness testing every three years
b. doc. of detection	x		
c. pipe leak detection	n/a		
d. doc. of detection	n/a		
e. if suction piping			
location of check valves	n/a		
f. if pressure piping			
1. line leak detector	n/a		
2. type leak detector	n/a		
3. year installed	n/a		
QUEST #3 (1974-1988)			
a. type leak detection	n/a		
pressure piping	n/a		
b. doc. leak detection	n/a		
c. whether auto line leak	n/a		
detector	n/a		
1. type	n/a		
2. year	n/a		
COMMENTS:	Needs some type of monthly monitoring		

	UST Certified Mailing		
	Response Checklist		
	Info	Info	
	Prov.	Negl.	
	-----	-----	-----
QUEST #1			
a. Location	x		
b. Age of Tank	x		1973
c. Type Piping	x		none
d. Size	x		9,500 gal
e. contents	x		permatox
f. status	x		in use
QUEST #2 (>1974 or <1988)			
a. tank leak detection	x		tightness testing every three years
b. doc. of detection	x		
c. pipe leak detection	n/a		
d. doc. of detection	n/a		
e. if suction piping			
location of check valves	n/a		
f. if pressure piping			
1. line leak detector	n/a		
2. type leak detector	n/a		
3. year installed	n/a		
	Cortrim		

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SINCE 1916

CORTRIM
Atlanta, GA
Hardwood Parts Company

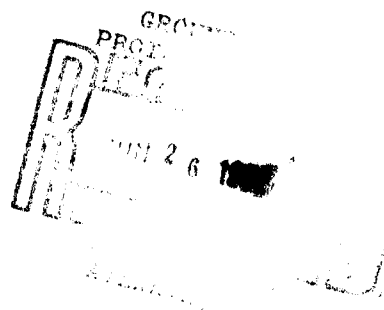


P.O. BOX 919 BRISTOL, TENNESSEE 37621 OR 1320 GEORGIA AVE. BRISTOL, TENNESSEE 37620

MANUFACTURERS OF HIGH QUALITY GLUED-UP DIMENSION AND WOOD PARTS FROM APPALACHIAN HARDWOODS
JAMES E. CULLEN, COMPANY, BRISTOL, TN

June 24, 1992

Mr. John Mason, Chief UST Section
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 Courtland Street, N.E.
Atlanta, GA 30365



Dear Mr. Mason:

Please find enclosed, Cortrim's response to your request for information, as dated June 19, 1992. (Ref: 4WM-GP)

I have assembled this information to the best of my ability, and I believe that it answers your request directly and concisely. Should you not be satisfied with the enclosed, please feel to contact me at the above address or telephone number. I will be more than happy to answer your questions or provide any additional information you may require.

I hereby certify that the enclosed information is correct and accurate to the extent of my knowledge of the subject.

Sincerely,

Robert D. Spiegler Jr.

Robert D. Spiegler Jr.
Engineer
Secretary

Enclosures

TANKS #1, 2 & 3
GASOLINE UST's on Lumber Yard

1. f. STATUS: Cortrim formerly had three gasoline UST's on it's lumber yard. These were removed from service in August 1990 and finally considered closed by the State of Tennessee in March of 1992. (See letter of Closure attached)
Cortrim subsequently built an above-ground storage facility for gasoline as well as for diesel fuel and kerosene. This facility was built with current regulations in mind, and includes secondary containment and a Spill Prevention, Control, and Countermeasure Plan.

TANK #4
#2 HEATING OIL UST near Boiler Room

1. a. LOCATION: In front of Plant, near Boiler Room. (See Map)
1. b. AGE: 21 years. Believed to be installed in 1971.
1. c. TYPE: Painted Steel. Piping is suction-type copper.
1. d. SIZE: 10'Dia. x 34'Lg. Rated Capacity - 20,000 Gal.
1. e. CONTENTS: #2 Fuel Oil for Onsite Boiler.
1. f. STATUS: Currently in use.
2. a. RELEASE DETECTION: Tightness Testing once every three years. (See note below)
2. b. DOCUMENTATION: 1989 Tightness Testing results are attached.
1992 Tests have been ordered but not complete.
2. c-f. PIPING: Same as above.

NOTE: According to Page #4 of EPA's publication, "Musts for USTs", "Tanks storing heating oil used on the premises where it is stored....are not covered by these regulations." We do, however stick-monitor and Tightness Test as a precaution.

TANK #5
CHEMICAL DIP VAT on Yard

1. a. LOCATION: Lumber Yard (See attached Map)
1. b. AGE: 19 Years. Vat was installed in 1973.
1. c. TYPE: Rectangular Steel Plate. Fabricated from 1/4" Steel plate, Fusion welded w/stiffener ribs.
1. d. SIZE: 18' x 10' x 7'Dp.
Capacities: Full to Brim - 9,500 Gal.
Normal Fill - 7,200 Gal.
1. e. CONTENTS: Current: Permatox 10-S* - 1% (by Wt. approx.)
Water - 99% (by Wt. approx.)
100%

*Permatox 10-S contains about 60% Borax, and about 40% Sodium Pentachlorophenate or equivalent. (MSDS Attached)

Future: Cortrim intends to discontinue use of Permatox 10-S, as soon as current supply is exhausted. We estimate this to occur in July or August, 1992. We will then begin use of KOP-KOTE materials which we believe to be environmentally safer. (See attached information)

1. f. STATUS: Tank is currently in use. We use it during the summer months only. Process is not necessary in cold weather.
2. a. RELEASE DETECTION METHODS: Tightness Testing once every three years. (See attached Sheet for Note)
2. b. DOCUMENTATION: Results of 1989 Tightness Test are attached. 1992 Tests have been ordered, but not yet completed.
2. c - f. PIPING: To the best of my knowledge, the Tank has no piping. It is filled by means of a garden hose and is not ever emptied. As chemical becomes dilute, more is added.

Tank #5
CHEMICAL DIP TANK on Yard

Note Regarding RELEASE DETECTION:

Having received Region IV's letter of December 1990, Cortrim has inquired many times regarding requirements for leak detection to be installed on this tank. Other than to tell us that the Region believes such protection should be provided for this tank, we cannot get any meaningful information regarding what kind of protection would be considered acceptable.

After repeated failure, Cortrim hired Mr. Jim Belgeri, P.E., of WESTINGHOUSE ENVIRONMENTAL AND GEOTECHNICAL SERVICES, INC. to further pursue this matter with State and Region IV authorities. Tennessee finally admitted it had no regulatory jurisdiction with respect to this tank, because it was not a Petroleum Underground Storage Tank. Mr. Belgeri could get no meaningful response from Region IV, either. He wrote a letter to Helen Lunsford on Dec. 20, 1991, outlining several possibilities for leak detection, including a secondary containment jacket, but could get no response as to whether anything he suggested might be acceptable. (see copy)

Mr. Belgeri made numerous followup telephone calls, to Helen Lunsford, Steve Wiley, and to a David Arail. On my last conversation with him, Mr. Belgeri told me he wanted to be released from this project, because all attempts to secure valid information from Region IV had failed. He suggested that Cortrim wait until Region IV became a little more organized, and could respond in a more meaningful way.

The Vat is an open-top dip vat with mostly water in it. With daytime heating, dipping operations going on, and constant evaporation, it would be an exercise in futility to try to get stick measurements. Cortrim has resorted to the only means it knows to be reasonably accurate - Tightness Testing.

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8

RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____ (Record of item checked above)	
TO: LeAnn Kolo Kop-Coat, Inc. 412/227-2700	FROM: Donna Seadler 404/347-3866	DATE 5-17-93 TIME 3:40 p.m.
SUBJECT NP-1 (R) Sapstain Control Chemical (dilute RTU)		
SUMMARY OF COMMUNICATION <p>I phoned Ms. Kolo because I did not know the ingredients of the NP-1 & therefore could not determine whether it was regulated under the UST regulations.</p> <p>She assured me it was not on the CERCLA, NPDES, or CAA lists of hazardous substances, but said she would fax me the MSDS for verification.</p>		
CONCLUSIONS, ACTION TAKEN OR REQUIRED		
INFORMATION COPIES TO:		

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KOP-COAT

**1850 KOPPERS BUILDING, 436 SEVENTH AVENUE
PITTSBURGH, PA 15219
PHONE #412-227-2700**

TO: DONNA SEADLER

COMPANY NAME: EPA REGION IV

COMPANY FAX NUMBER: 404-547-1799

FROM: LOIS NEWMAN

TROUBLE WITH THE TRANSMISSION? CALL:
(412) 227-2674

OUR FAX NUMBER IS (412) 227-2618

SENT BY: _____ **DATE:** 5-17-93

TOTAL PAGES INCLUDING COVER: 6

05/17/93

-1(R) Sapstain Control Chemical (Concentrate)

WPR00A25MR9318

Your company is a current purchaser or has received/requested samples of one or more of the above-named products. Material Safety Data Sheets are enclosed for these products. Material Safety Data Sheets are being supplied to you as required by the OSHA Hazard Communication Standard (29 CFR 1910.1200) to assist you in the development of your Hazard Communication Program. It is your responsibility to provide this information to the appropriate individual(s) within your organization who are responsible for the dissemination of this information to your employees. If this product/sample is used at a location other than that of the mailing address, it is your responsibility to forward this information to the location(s) at which this product is used. If this Material Safety Data Sheet is revised, the revised version will be forwarded to you. If you resell a Kop-Coat product it is your responsibility to provide adequate warnings to your customers in the form of the Material Safety Data Sheet and labels.

If you are a wholesale/retail distributor who sells Kop-Coat products to commercial customers you must provide an MSDS to these customers upon request, and additionally you must post a sign or otherwise inform your customers that MSDS is available to them upon request.

If you need information concerning Material Safety Data Sheets or their distribution, or if you need labeling information, contact Lee Ann Kolo at 412-227-2892. If you need technical information concerning the products you purchase from us, call 412-227-2700. If you need access to Kop-Coat's Product Emergency Response System call toll-free, 800-548-0489. For emergency calls originating outside the U.S.A., call 412-227-2700.

Kop-Coat is pleased to provide you with this information and looks forward to serving you again in the future.

EPA REGION IV
FAX: 404-347-1799

DONNA SEADLER

MAY-17-93 MON 16:00

P.03

TERIAL KOP-COAT, .
FETY
TA
EET

24 HOUR PRODUCT
EMERGENCY NUMBER : 800-548-0489
OUTSIDE U.S.A.: 412-227-2700

P-COAT, INC.
6 SEVENTH AVENUE
PITTSBURGH, PA 15219

CHEMTREC ASSISTANCE: 800-424-9300
CANUTEC: 613-996-6666

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: NP-1(R) Sapstain Control Chemical (Concentrate)

MODIFY NUMBER: SEE SECTION XII

NONYM: None

PRODUCT USE: Wood preservative

EMICAL FAMILY: Microemulsion

FORMULA: Mixture

S NUMBER: None

DOT INFORMATION

APPLICABLE REGULATION : 49 CFR 171 - 179

S. POSTAL REGULATIONS : Not Shippable

PROPER SHIPPING NAME: Corrosive liquids, flammable, n.o.s. (DDAC)

HAZARD CLASS: Corrosive material

HAZARD LABEL: Corrosive, Flammable

NA NUMBER: UN 2920

LIMITED QUANTITY: Yes

SECTION II - HEALTH/SAFETY ALERT

DANGER

CORROSIVE TO THE EYES AND SKIN

CAUSES SEVERE BURNS

MAY BE FATAL IF INHALED

MAY BE FATAL IF ABSORBED THROUGH SKIN

MAY BE FATAL IF SWALLOWED

AVOID CONTACT WITH SKIN, EYES AND CLOTHING

DO NOT USE THIS PRODUCT UNTIL MSDS HAS BEEN READ AND UNDERSTOOD

SECTION III - HEALTH HAZARD INFORMATION

HAZARD STATEMENT: Corrosive. Causes irreversible damage.

HAZARD DESCRIPTION: Corrosive. Causes skin burns. Can penetrate the skin to cause internal organ damage which may be fatal. This product has been shown NOT to produce an allergic reaction in humans based upon the results of human testing.

EXPOSURE: Inhalation: May produce irritation of the airways. Prolonged inhalation of concentrated mists may be fatal.

INGESTION: May be fatal if swallowed.

REVISION DATE: 03/93
IDENTIFICATION SHEET NUMBER: CFR(7/84)
MODIFY NUMBER: SEE SECTION XII

CODE NUMBER: WPR00A25MR9318
REPLACES SHEET: WPR00A25DE9117

SUPPLIER INFORMATION: Same as manufacturer.

ODUCT NAME: NP-1(R) Sapst n Control Chemical (Conce rate)

PAGE 2

SECTION IV - EMERGENCY AND FIRST AID PROCEDURES

E CONTACT: Immediately flush with large amounts of water for 15 minutes. Immediately seek medical aid.

IN CONTACT: Wash thoroughly with soap and water. Remove contaminated clothing. If irritation persists, seek medical aid.

HALATION: Remove from exposure. If breathing has stopped or is difficult, administer artificial respiration or oxygen as indicated. Seek medical aid.

GESTION: Do not induce vomiting. Give 1 glass of milk or 1 to 2 oz (30 to 60 g) of activated charcoal in water to victim as tolerated. Immediately seek medical aid. DO NOT ATTEMPT TO GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

TE TO PHYSICIAN: Mucosal damage may contraindicate the use of gastric lavage. Assures against circulatory shock, respiratory depression and convulsions may be required. Although carbamates are known to cause cholinesterase inhibition, propyl carbamate did not inhibit cholinesterase in animal tests.

SECTION V - FIRE AND EXPLOSION HAZARD INFORMATION

ASH PT. & METHOD: 104F/40C (TCC)

AUTOIGNITION TEMP: No information found

AMMABLE LIMITS (% BY VOLUME/AIR):

LOWER: No information found

UPPER: No information found

TINGUISHING MEDIA: Use dry chemical, carbon dioxide, foam or water spray. Use water spray (fog).

RE-FIGHTING PROCEDURES: Wear complete fire service protective equipment, including full-face MSHA/NIOSH approved self-contained breathing apparatus. Use water to cool fire-exposed container/structure/protect personnel. Toxic vapors may be given off in a fire.

RE AND EXPLOSION HAZARDS: When heated (fire conditions), vapors/decomposition products may be released forming flammable/explosive mixtures in air. Closed containers may explode when exposed to extreme heat (fire).

NSITIVITY TO MECHANICAL IMPACT: No information found

NSITIVITY TO STATIC DISCHARGE: No information found

SECTION VI - SPILL, LEAK AND DISPOSAL INFORMATION

ILL OR LEAK PROCEDURES (PRODUCT): Stop leak if no risk involved. Stay upwind. For all spills: Spread absorbents. Shovel absorbed material into container. Large spills: Dike and contain spill. Pump to storage or salvage vessels. Contain runoff from fire control and dilution water. Prevent run-off to sewers, streams or other bodies of water. If run-off occurs, notify proper authorities that a spill has occurred.

STE DISPOSAL: This product is a US EPA defined ignitable hazardous waste. Dispose of as an ignitable waste in accordance with local, state and federal regulations. Place in tightly sealed labeled containers. This product released to the environment must be reported to the National Response Center (1-800-424-8802).

ODUCT NAME: NP-1(R) Sapst n Control Chemical (Conce rate)

PAGE 3

SECTION VII - RECOMMENDED EXPOSURE LIMIT/HAZARDOUS INGREDIENTS

EXPOSURE LIMIT (PRODUCT):

*15 minutes

**none established

***exposure limits are for petroleum distillates (naphtha)

HAZARDOUS INGREDIENTS

CAS NUMBER

% BY WT.

EXPOSURE LIMIT (PPM;MG/M3)

Iodo-2-Propynyl butyl carbamate 55406-53-6 <10

petroleum naphtha*** 64742-88-7 <5

**

OSHA-TWA

400

1600

NIOSH

-

350

NIOSH-STEL

-

1800*

ACGIH-TLV

1000

1880

**

OSHA-TWA

1000

1900

ethyl Alcohol (ethanol)

64-17-5 <10

Dimethyl sulfoxide

67-68-5 <5

Decyl Dimethyl Ammonium

7173-51-5 <65

**

Chloride

----- SARA TITLE III SECTION 313 CHEMICALS -----
(SEE SECTION VII FOR CAS NUMBERS AND PERCENTAGES)

None

SECTION VIII - PERSONAL PROTECTION INFORMATION

PERSONAL PROTECTION: Industrial safety glasses, minimum. As necessary to comply with 29 CFR 1910.133 and work area conditions: use side shields, goggles or face shield.

SKIN PROTECTION: As required, industrial resistant flexible-type gloves (nitrile, neoprene or equal). Wear industrial type work clothing and safety footwear. Depending on working conditions, i.e., contact potential, wear appropriate protective garments such as head/neck cover, aprons, jackets, pants, overalls, boots, etc.

RESPIRATORY PROTECTION: If ventilation does not maintain inhalation exposures below TLV(PEL), Use MSHA/NIOSH approved units as per current 29 CFR 1910.134 and manufacturers' "Instructions" and "Warnings". combination filter/organic vapor cartridges or canisters may be used.

VENTILATION: Provide sufficient general/local exhaust ventilation in pattern/volume to control inhalation exposures below current exposure limits. Work areas below flammable vapor concentrations. Local exhaust is necessary for work in enclosed or confined spaces. See OSHA Requirement/NIOSH Pub. 80-106 "Working in a Confined Space".

SECTION IX - PERSONAL HANDLING INSTRUCTIONS

HANDLING: Avoid prolonged or repeated breathing of vapors, mists or fumes. Avoid prolonged or repeated contact with skin or eyes. Observe good personal hygiene practices and recommended procedures. Handle and use in accordance with 29 CFR 1910.106/local codes.

STORAGE: Store in areas/buildings designed to comply with OSHA 1910.106. Keep in a closed, labeled container within a cool (well shaded), dry, ventilated area. Protect from physical damage. Keep containers closed when material is not in use. Maintain good housekeeping.

SAFETY: Not for use or storage in or around the home. DO NOT TAKE INTERNALLY. Do not use until manufacturer's precautions have been read/understood. Wash exposed areas promptly and thoroughly after skin contact and before eating, drinking, using tobacco products or rest rooms. Showering and clothing change recommended at the end of each shift. Wash work clothes separately from other household clothing. Clean contaminated equipment thoroughly prior to making welding pairs.

ODUCT NAME: NP-1(R) Sapst n Control Chemical (Conce rate)

PAGE 4

SECTION X - REACTIVITY DATA

NDITIONS CONTRIBUTING TO INSTABILITY: none

COMPATABILITY: none known

ZARDOUS REACTIONS/DECOMPOSITION/COMBUSTION PRODUCTS: Carbon dioxide; carbon
noxide; ammonia; nitrous oxide; ammonium chloride

NDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: none

SECTION XI - PHYSICAL DATA

ILING POINT: No information found

EC. GRAV. OR WT/GAL :0.9314 at 25 C

LTING POINT: Not applicable

VOLATILE BY VOL: 25

POR PRESSURE: 1 mm Hg

APORATION RATE(ETHER=1): <1

POR DENSITY(AIR=1): >1

SCOSITY: 145.04*

LUBILITY

(WATER): miscible

: 7.9 (10%)

C: Not applicable

EFFICIENT OF WATER/OIL DISTRIBUTION: No information found

EEZING POINT: <-20 C (-4 F)

PEARANCE/ODOR: Amber colored liquid with a weak fatty amine odor
*centistokes/sec.

SECTION XII - COMMENTS

EPA REGISTRATION NUMBER: 60061-27

PEST CONTROL PRODUCTS ACT REGISTRATION NUMBER:21753

Individuals with pre-existing disease in or a history of ailments
volving the eyes, skin, nervous system, liver, kidney are at a greater than
rmal risk of developing adverse health effects when working with this
terial.

COMMODITY NUMBERS: 38012463, 38012465, 38012466

No known ingredients which occur at greater than 0.1% are listed as a
rcinogen in the IARC Monographs on the Evaluation of the Carcinogenic Risk of
emicals to Humans, the NTP Annual Report on Carcinogens or OSHA 29 CFR
10.1001-1047 subpart Z Toxic and Hazardous Substances (Specifically Regulated
stances).

SKIN PROTECTION (protective material): Permeation/degradation values of
emical mixtures cannot be predicted from pure components or chemical classes.
hus, these materials are normally best estimates based on available pure
mponent data. A significant difference in chemical breakthrough time has
en reported for generically similar gloves from different manufacturers (AIHA
, 48, 941-947 1987).

Do not use until manufacturer's precautions have been read/understood.
sh exposed areas promptly and thoroughly after skin contact from working with
is product and before eating, drinking, using tobacco products or rest rooms.
Do not wear contact lens without proper eye protection when using this
oduct.

epared By: Occupational Health and Product Safety Department - C.A.Hope

TICE: While the information and recommendations set forth herein are believed
to be accurate as of the date hereof, Kop-Coat, Inc. makes no warranty
with respect thereto and disclaims all liability from reliance thereon.

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10
JUN 14 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert D. Spiegle, Jr.
Cortrim Hardwood Parts Company
P.O. Box 919
Bristol, Tennessee 37621

Re: Chemical Dip Vat

Dear Mr. Spiegle,

In your letter of June 24, 1992, you requested assistance in determining a release detection method for an open-top Underground Storage Tank (UST). At the time the letter was written, the UST was used for storage of Permatox and water. You stated that, in the future, Cortrim planned to discontinue use of the Permatox and use a material manufactured by Kop-Coat, Inc., called NP-1(R) Sapstain Control Chemical (the diluted, ready-to-use form).

Upon investigation of the chemical content of Permatox and Sapstain Control Chemical, EPA has determined that neither substance is regulated under 40 C.F.R. Part 280, the federal UST regulations.

If you have any questions, you may contact Donna Seadler, Environmental Engineer, at 404/347-3866.

Sincerely yours,

John K. Mason, Chief
Underground Storage Tank Section

QJS
SEADLER
6-9-93

JGR
GORDON
6/10

JGR
MASON
6/10/93

disk: tennessee
file: cortrim.not

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JOHNSON CITY ENVIRONMENTAL FIELD OFFICE
2305 SILVERDALE ROAD
JOHNSON CITY, TENNESSEE 37601-2162
(615) 854-5400 FAX (615) 854-5401

RECEIVED
EPA REGION IV
OCT 20 4 02 PM '95

October 16, 1995

Mr. Robert D. Spiegel, Jr., Plant Engineer
Cortrim Hardwood Parts Company
P. O. Box 919
Bristol, Tennessee 37621

RE: Hazardous Waste Inspection
TND 00-338-7735

Dear Mr. Spiegel:

This letter confirms the observations and recommendations which were made during the Hazardous Waste Small Quantity Generator Inspection conducted at Cortrim Hardwood Parts Company on October 12, 1995. The attached inspection report verifies that no violations were identified during the inspection.

If you have any questions or comments concerning this letter or any part of the inspection report, do not hesitate to contact me at 854-5434.

Sincerely,

Bethanie Glynn
Division of Solid Waste Management

BG/13025289 CONFIRM

Attachment

cc: Ms. Kristin Lippert, EPA, Region IV, Atlanta
DSWM, Nashville
DSWM, JCFO File #82-65 12

04188096

Hazardous Waste Inspection Report

Site/Operation Inspected:

Cortrim Hardwood Parts Company
1320 Georgia Avenue
Bristol, Tennessee 37620

Facility Status:

Small Quantity Generator
TND 00-338-7735

Owner/Operator/Primary Contact:

Robert D. Spiegel, Jr., Plant Engineer
Cortrim Hardwood Parts Company
P.O. Box 919
Bristol, Tennessee 37621
423\764-6127

Date and Time of Inspection:

October 12, 1995 - Starting at 10:00

Other Inspection Participants:

Robert D. Spiegel, Jr., Cortrim

Report Prepared By:

Bethanie Glynn
Division of Solid Waste Management
2305 Silverdale Road
Johnson City, Tennessee 37601
423/854-5434

Purpose of Inspection:

This inspection was conducted to evaluate Cortrim Hardwood Parts Company's compliance with the applicable requirements of "Tennessee's Hazardous Waste Management Regulations".

Facility Description:

Cortrim Hardwood Parts Company manufactures wooden furniture parts for other industries. Cortrim also manufactures wooden caskets as a finished product. A description of the processes and wastes generated is as follows:

Safety Kleen non-hazardous parts cleaning solution is used to clean machine parts in the Maintenance building. Painting is done with spray cans and some brush work. Brushes are cleaned in the Safety Kleen solution. Scrap metal generated from machining operations is sold to Twin City Metal. Lubricant is applied with a spray can to the machining tools. The 55 gallon containers of product and used oil are stored behind the Maintenance Building.

Raw lumber is stored at the site. Lumber is dipped in a solution containing ammonium chloride and water for fungus control. The ammonium chloride replaced previously used sodium pentachlorophenate. This solution is maintained in a 5,000 gallon open top tank. The lumber is allowed to air dry over the tank before it is sorted and stacked onto pallets. No waste has been removed from the tank since the operation began.

The pallets of lumber are placed in kilns to dry. The lumber is dried at temperatures between 90 F and 200 F for one to two weeks depending on the type of wood. The kilns are heated by the boilers. The boilers burn wood scraps and saw dust. Fume hoods over the various cutting machines collect saw dust and transport it to a bin where it is stored with other wood scraps. The wood is then augered to the boilers for fuel. The boilers are treated with an oxygen scavenger (removes free oxygen to prevent corrosion of the pipes) and a neutralizer (water softener) during normal operations. The solids from the boilers are blown down three times a day, discharging approximately 150 gallons of water and solids to the Bristol sanitary sewer.

Furniture and casket parts are crafted in the main building. Non-hazardous polyvinyl glue is used to secure parts. Brushes and machine rollers, used to spread the glue, are cleaned in a tub containing water. The water is discharged to the Bristol sanitary sewer. All wiping rags are cleaned and reused. The unfinished furniture is shipped offsite. The casket parts are moved to the Casket Building.

The machine shop is located in the main building. Rotor blades and other cutting tools are made here. Non-hazardous water based coolant and water are circulated through the machines. Spent coolant is discarded to the Bristol sanitary sewer.

In the Casket Building, caskets are assembled and finished. Stain is applied by hand and stain and lacquer is applied with spray equipment in booths. Stripping operations are done in the booths on a table that collects the thinner/stripper and drains it to an in-line collection bucket. Spent lacquer and lacquer thinner generated from cleaning of spray equipment is also collected in the catch basin. Once the bucket is full, the spent thinner is

transferred to a 55 gallon drum and stored in the hazardous waste accumulation area. Two drums were present with accumulation start dates of 8-15-95 and 9-1-95. Waste lacquer and lacquer thinner are reclaimed by Prilliman Company of Martinsville, Virginia (VAD 00-311-4168). Review of manifests revealed the following shipments of F005, F003, D001 hazardous waste:

8-11-95	525 kg
3-29-95	525 kg
3-01-95	525 kg
6-30-94	525 kg
1-27-94	525 kg

Land ban notification accompanied shipments.

The wall coatings from the booths are periodically replaced and disposed of as a Special Waste at Iris Glen Landfill.

Inspection Findings:

No violations of "Tennessee's Hazardous Waste Management Regulations" were identified during the inspection.

Signed: BW Date: 10-17-95

BWG/13035289

82-65 12

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OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emission limitations, monitoring requirements set forth herein.

Date Issued:

Permit Number:

546211M

Date Expires:

Issued To:

Cortrim Hardwood Parts Company

Installation Address:

1320 Georgia Avenue
Bristol

Installation Description:

- 01 - Wood-Waste Boilers #1 & #2
- 03 - Woodworking Operation
- 06 - Woodworking Operation
- 07 - Six(6) Spray Booths for Coating WoodCaskets

Emission Source Reference No.: 82-0039-01, 03, 06 & 07

Renewal Application Due Date:

Primary SIC: 39

Responsible Official:

Name : Robert D. Spiegle, Jr.
Title: President/Owner

Facility Contact Person:

Name : Robin L. Price
Title: Project Engineer
Phone: 423-764-6127

Information Relied Upon:

Application dated November 8, 1996. ✓

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON TRANSFERABLE

POST OR FILE AT INSTALLATION ADDRESS

CN-0827 (Rev. 9-92)

RDA-1298

DRAFT

SECTION A - GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-3-9-.02(11) is a permit issued pursuant to the requirements of title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR part 70.

A1 Definitions

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-3

A2 Compliance requirement

All terms and conditions in a permit issued pursuant to paragraph 1200-3-9-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable, non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-3-09-.02(11)(e)2(i) and 1200-3-09-.02(11)(e)1(vi)(I)

A3 Need to halt or reduce activity

The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-3-09-.02(11)(e)1(vi)(II)

A4 The permit

The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. This permit supersedes any previous permits for sources included in the Title v application.

TAPCR 1200-3-09-.02(11)(e)1(vi)(III)

A5 Property rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-3-09-.02(11)(e)1(vi)(IV)

A6 Submittal of requested information

The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-3-09-.02(11)(e)1(vi)(V)

A7 Severability clause

The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-3-9.02(11)(e)1.(v)

A8 Fee payment

a. The permittee shall pay an annual major source emission fee based upon the responsible official's choice of actual emissions or allowable emissions. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A major source annual emission fee will not be charged for emissions in excess of the cap (s) or for carbon monoxide.

b. Major sources who have filed a timely, complete operating permit application in accordance with 1200-3-9-.02(11), shall pay allowable emission based fees until the beginning of the next annual accounting period following receipt of their major source operating permit. At that time, the permittee shall begin paying their annual emission fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees as stated under SECTION E of this permit. Once permitted, altering the existing choice shall be accomplished by a written request of the major source, filed in the office of the Technical Secretary at least one hundred eighty days prior to the expiration or reissuance of the major source operating permit.

c. Major sources must conform to the following requirements with respect to fee payments:

i. If a major source choosing an allowable based annual emission fee wishes to restructure its allowable emissions for the purposes of lowering its annual emission fees, a mutually agreed upon, more restrictive regulatory requirement may be established to minimize the allowable emissions and thus the annual emission fee. The more restrictive requirement must be specified on the permit, and must include the method used to determine compliance with the limitation. The documentation procedure to be followed by the major source must also be included to insure that the limit is not exceeded. Restructuring the allowable emissions is permissible only in the annual accounting periods of eligibility and only, if the written request for restructuring is filed with the Technical Secretary at least 120 days prior to the beginning of the annual accounting period of eligibility. These periods of eligibility occur upon expiration of the initial major source operating permit, renewal of an expired major source operating permit or reissuance of a major source operating permit.

ii. Beginning with the annual accounting period beginning July 1, 1997 to June 30, 1998, major sources paying on allowable based emission fees will be billed by the Division no later than April 1 prior to the end of the accounting period. The major source annual emission fee is due July 1 following the end of the accounting period.

iii. Beginning with the annual accounting period beginning July 1, 1997 to June 30, 1998, major sources choosing an actual based annual emission fee shall file an actual emissions analysis with the Technical Secretary which summarizes the actual emissions of all regulated pollutants at the air contaminant sources of their facility. Based upon the actual emissions analysis, the source shall calculate the fee due and submit the payment and the analysis each July 1st following the end of the annual accounting period.

iv. Beginning with the annual accounting period beginning July 1, 1997 to June 30, 1998, major sources choosing a mixture of allowable and actual based emission fees shall file an actual emissions and allowable emissions analysis with the Technical Secretary which summarizes the actual and allowable emissions of all regulated pollutants at the air contaminant sources of their facility. Based upon the analysis, the source shall calculate the fee due and submit the payment and the analysis each July 1st following the end of the annual accounting period.

The mixed based fee shall be calculated utilizing the 4,000 ton cap specified in subparagraph 1200-3-26-.02(2)(i). In determining the tonnages to be applied toward the regulated pollutant 4,000 ton cap in a mixed based fee, the source shall first calculate the actual emission based fees for a regulated pollutant and apply that tonnage toward the regulated pollutant's cap. The remaining tonnage available in the 4,000 ton category of a regulated pollutant shall be subject to allowable emission based fee calculations for the sources that were not included in the actual emission based fee calculations. Once the 4,000 ton cap has been

reached for a regulated pollutant, no additional fee shall be required.

v. Major sources choosing to pay their major source annual emission fee based on actual based emissions or a mixture of allowable and actual based emissions may request an extension of time to file their emissions analysis with the Technical Secretary. The extension may be granted by the Technical Secretary up to ninety (90) days. The request for extension must be received by the Division no later than 4:30 p.m. on July 1 or the request for extension shall be denied. The request for extension to file must state the reason and give an adequate explanation. An estimated annual emission fee payment of no less than eighty percent (80%) of the fee due July 1 must accompany the request for extension to avoid penalties and interest on the underpayment of the annual emission fee. A remaining balance due must accompany the emission analysis. If there has been an overpayment, a refund may be requested in writing to the Division or be applied as a credit toward next year's major source annual emission fee. The request for extension of time is not available to major sources choosing to pay their major source annual emission fee based on allowable emissions.

vi. Newly constructed major sources or minor existing sources modifying their operations such that they become a major source in the midst of the standard July 1st to June 30th annual accounting period, shall pay allowable based annual emission fees for the fractional remainder of the annual accounting period commencing upon their start-up. At the beginning of the next annual accounting period, the "responsible official" of the source may choose to pay annual emission fees based on actual or allowable emissions or a mixture of the two as provided for in this rule 1200-3-26-.02.

d. Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-3-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

i. Sources that are subject to federally promulgated hazardous air pollutant standards that can be imposed under Chapter 1200-3-11 or Chapter 1200-3-31 will place such regulated emissions in the specific hazardous air pollutant under regulation. If the pollutant is also in the family of volatile organic compounds or the family of particulates, the pollutant shall not be placed in that respective family category.

ii. A miscellaneous category of hazardous air pollutants shall be used for hazardous air pollutants listed at part 1200-3-26-.2(2)(i)12 that do not have an allowable emission standard. A pollutant placed in this category shall not be subject to being placed in any other category such as volatile organic compounds or particulates.

iii. Each individual hazardous air pollutant and the miscellaneous category of hazardous air pollutants is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

iv. Major sources that wish to pay annual emission fees for PM10 on an allowable emission basis may do so if they have a specific PM10 allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM 10 emission basis, it may do so if the PM10 actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM10 emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM10 emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i) shall also apply to PM10 emissions.

TAPCR 1200-3-26-.02 (3) & (9) and 1200-3-9-.02(11)(e)1.(vii)

A9 Permit revision not required

A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-3-09-.02(11)(e)1(viii)

A10 Inspection and entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- a. Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the Clean Air Act and Chapter 1200-3-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- e. "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-3 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-3-9-.02(11)(e)3.(ii)

A11 Permit Shield

- a. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

- i. Such applicable requirements are included and are specifically identified in the permit; or
 - ii. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this permit shall alter or affect the following:
- i. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act;
 - iv. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- c. Permit shield is granted to the permittee.

A12 Permit renewal and expiration

- a. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted at least 180 days, but no more than 270 days prior to the expiration of this permit.
- b. Provided that the permittee submits a timely and complete application for permit renewal the source will not be considered in violation of paragraph 1200-3-9-.02(11) until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-3-9-.02(11).
- c. This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-3-9-.02(11)(f)3 and 2, 1200-3-9-.02(11)(d)1(i)(III), and 1200-3-9-.02(11)(a)2

A13 Reopening for cause

- a. A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
 - i. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later

than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-3-9-.02(11)(a)2.

ii. Additional requirements become applicable to an affected source under the acid rain program.

iii. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iv. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

b. Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

c. Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely effected by the operation of a source that is in compliance with its permit requirements.

d. If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

i. The Technical Secretary shall within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.

ii. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

iii. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13b and Condition A13c.

iv. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13d, he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the

Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-3-9-.02(11)(f)6 and 7.

A14 Permit transference

An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- a. transfer of ownership permit application is filed consistent with the provisions of 1200-3-9-.03(6), and
- b. written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-3-9-.02(f)4.(i)(IV) and (1200-3-9-.03(6)

A15 Air pollution alert

When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-3-9-.03(1) and TAPCR 1200-3-15-.03.

A16 Construction permit required

Except as exempted in TAPCR 1200-3-9-.04, TAPCR 1200-3-9-.02(11)(f)5, and sources considered insignificant under TAPCR 1200-3-9-.04(5), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-3-9-.01(1)a

A17 Notification of changes

The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- a. change in air pollution control equipment
- b. change in stack height or diameter
- c. change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-3-9-.02(7)

A18 Schedule of compliance

The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

A19 Title VI

- a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - i. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
 - ii. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
 - iii. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.
- b. If the permittee performs a service on motor(fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner(MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- c. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program(SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20 112 (r)

The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR 68, to submit such a plan.

SECTION B - GENERAL CONDITIONS FOR MONITORING, REPORTING, & ENFORCEMENT

B1 Record keeping

Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than at least 180 days.

a. Where applicable, records of required monitoring information include the following:

- (i) The date, place as defined in the permit, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analysis;
- (iv) The analytical techniques or methods used;
- (v) The results of such analyses; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

b. Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

B2 Retention of monitoring data

The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-3-9.02(11)(e)1.(iii)(II)II

B3 Reporting

Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reporting periods will be dated from the end of the first complete calendar quarter following issuance of this permit. Reports shall be submitted within 60 days of the close of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official.

Reports required under "State only requirements" are not required to be certified by the responsible official.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

B4 Certification

Any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-3-9-.02(11)(d)4

B5 Annual compliance certification

The permittee shall submit annually compliance certifications with terms and conditions contained in this permit, including emission limitations, standards, or work practice. The first submittal shall coincide with the second compliance monitoring report required by Condition B3 and cover the same period of operation covered by the first two reports required under Condition B3. This compliance certification shall include the following:

- a. The identification of each term or condition of the permit that is the basis of the certification;
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the requirements of the individual permit unit as specified in accordance with TAPCR 1200-3-9-.02(11)(e)1(iii).
- e. Such other facts as the Technical Secretary may require to determine the compliance status of the source;

TAPCR 1200-3-9-.02(11)(e)(3)(v)

B6 Submission of compliance certification

The compliance certification shall be submitted to:

- a. The Technical Secretary
Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531, and
- b. Air and EPCRA Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

B7 Emergency provisions

An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

a. The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(i) An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

(ii) The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

(iii) During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

(iv) The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-3-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunctions(s)" in rule 1200-3-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

b. In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

c. The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-3 or other applicable requirement.

TAPCR 1200-3-9-.02(11) (e) 7

B8 Excess emissions reporting

a. The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-3 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be with 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected and the equipment is again in operation.

b. Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office and to the State Civil Defense.

c. A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-3 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

- i. Stack or emission point involved
- ii. Time malfunction, startup, or shutdown began and/or when first noticed
- iii. Type of malfunction and/or reason for shutdown
- iv. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
- v. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items i and ii must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-3-20-.03 and .04

B9 Malfunctions, Startups and Shutdowns - Reasonable Measures Required

The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be

considered malfunctions. This provision does not apply to standards found in 40 CFR parts 60 (Standards of performance for new stationary sources), 61 (National emission standards for hazardous air pollutants) and 63 (National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-3-20-.02

B10 Sources Located in Non-attainment Areas or having Significant Impact on Air Quality in a Non-attainment Area

The owner or operator of all sources located in non-attainment areas or having a significant impact on air quality in a non-attainment area (for the pollutant designated) must submit a report to the Technical Secretary within thirty (30) days after the end of each calendar quarter listing the times at which malfunctions, startups and/or shutdowns, which resulted in emissions greater than any applicable emission limits and the estimated amount of emissions discharged during such times. This report shall also include total emissions during the quarter and be reported in a format specified by the Technical Secretary.

TAPCR 1200-3-20-.04(2)

B11 Report required upon the issuance of notice of violation

The permittee must submit within twenty (20) days after receipt of the notice of violation, the data shown below to assist the Technical Secretary in deciding whether to excuse or validate the violation. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all time maintained and operated in a manner consistent with good operating practices for minimizing emissions. Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for consideration of excusal for malfunctions.

TAPCR 1200-3-20-.06(2), (3) and (4)

SECTION C - PERMIT CHANGES

C1 Off-Permit Changes

Unless specifically prohibited or addressed by this permit or 1200-3, the permittee may make any change in its operations or emissions without obtaining an amendment or modification of this permit.

C2 Section 502(b)(10) changes

a. The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-3 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes.

The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-3-9-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.

b. The written notification must include the following:

i. brief description of the change within the permitted facility;

ii. specifies the date on which the change will occur;

iii. declares any change in emissions; and

iv. declares any permit term or condition that is no longer applicable as a result of the change.

c. The permit shield provisions of TAPCR 1200-3-9-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-3-9-.02(11)(a)4

C3 Administrative amendment

a. Administrative permit amendments to this permit shall be in accordance with 1200-3-9-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

b. The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-3-9-.02(11)(e)6 for such revisions made pursuant to item "c" of this condition which meet the relevant requirements of TAPCR 1200-3-9-.02(11)(e), TAPCR 1200-3-9-.02(11)(f) and TAPCR 1200-3-9-.02(11)(g) for significant permit modifications.

c. Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-3-9-.02(11)(f)4

C4 Minor permit modifications

a. The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-3-9-.02(11)(f)5.(ii).

- b. The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
- c. Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- d. Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-3-9-.02(11)(f)5.(ii)

C5 Significant permit modifications

- a. The permittee may submit an application for a significant modification in accordance with TAPCR 1200-3-8-.02(11)(f)5.(iv.).
- b. Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-3-9-.02(11)(f)5.(iv)

C6 New construction or modifications

- a. The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- b. Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-3-9-.02(11)(f)(4) or the significant modification route of TAPCR 1200-3-9-.02(11)(f)5(iv).
- c. Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-3-9-.02(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-3-9-.02(11)(5)(iii) as applicable to the magnitude of their construction.

Vom
1/23/97

C7. Alternative permitting revision procedures

The permittee has the option for permitting flexibility to use future revisions to the federal permit revision procedures upon the effective date of such revisions, but not yet state effective for the State of Tennessee.

SECTION D - GENERAL APPLICABLE REQUIREMENTS

D1 Visible Emissions

IN ABSENCE OF A SET SPECIFIC VISIBLE EMISSION STANDARD, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that, for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-3-5 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or his/her representative upon his request.

TAPCR 1200-3-5-.01(1), TAPCR 1200-3-5-.01(6) and TAPCR 1200-3-5-.02(1)

D2 General provisions and applicability for non-process gaseous emissions

Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-3-6-.03(2)

D3 Non-process emission standards

The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-3-6. These standards shall be calculated using the equations found at TAPCR 1200-3-6-.02.

D4 General provisions and applicability for process gaseous emissions

Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-3-7-.07(2)

D5 Particulate emissions from process emission sources

The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-3-7.

D6 Sulfur Dioxide Emission Standards

The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-3-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretariat of the Tennessee Air Pollution Control Board.

D7 Fugitive Dust

a. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

i. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;

ii. Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

iii. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

b. The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates.

TAPCR 1200-3-8

D8 Open burning

a. The permittee shall not cause, suffer, allow, or permit open burning except as specifically exempted by Rule 1200-3-4-.04 Exceptions to Prohibition, or as authorized by a specific permit in rule 1200-3-4-.05.

b. Open burning except for the exemptions contained in Rule 1200-3-4-.04 will not be allowed in any area where the open burning would interfere with the attainment or maintenance of the air quality standards.

c. No open burning permit shall be issued in any non-attainment or additional control area that might be affected by applicable contaminants from such open burning, nor any location within one half (1/2) miles of such a nonattainment or additional control area.

d. The open burning of tires, vinyl shingles and/or asphalt shingles is expressly prohibited.

TAPCR 1200-3-4

D9 Asbestos

Where applicable, the permittee shall comply with the requirements of 1200-3-11-.02(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-3-11-.02(d) and 40 CFR Part 61

SECTION E - SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, AND MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

The following condition shall apply to all sources in section E of this permit unless otherwise noted.

FEE PAYMENT: ACTUAL BASED EMISSION FEES

1. The permittee shall pay an annual major source emission fee based on actual emissions. Beginning with the annual accounting period beginning July 1, 1997 to June 30, 1998, major sources choosing an actual based annual emission fee shall file an actual emissions analysis with the Technical Secretary which summarizes the actual emissions of all regulated pollutants at the air contaminant sources of their facility. Based upon the actual emissions analysis, the source shall calculate the fee due and submit the payment and the analysis each July 1st following the end of the annual accounting period.

82-0039-01 Wood-Waste Boilers #1 and #2 150 HP Each

2. Particulate matter emitted from this source shall not exceed 0.55 pounds per million Btu of heat input not to exceed 7.7 pounds per hour.

TAPCR 1200-3-19-.11(2)(a)2.

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

3. No person shall cause, suffer, allow or permit discharge of a visible emission from any stack with an opacity in excess of ten (10) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period.

TAPCR 1200-3-19-.11(1)(a)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

4. Sulfur dioxide emitted from this source shall not exceed 0.5 pounds per hour.

TAPCR 1200-3-26-.02(6)(b)

Compliance Method: Compliance with this condition may be determined from condition 6 or, if deemed necessary, from actual emissions measurement as prescribed by the Technical Secretary.

5. Wood-waste only shall be used as fuel for this source.

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6. Visible emissions from baghouses shall not exceed 10% opacity for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period.

TAPCR 1200-3-19-.11(1)(a)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

7. Visible emissions from cyclones shall not exceed 15% opacity for an aggregate of more than 5 minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period.

TAPCR 1200-3-19-.11(1)(c)2.

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

8. Particulate matter emitted from each cyclone shall not exceed 0.02 grains per dry standard cubic foot not to exceed 5.0 pounds per hour.

TAPCR 1200-3-19-.11(2)(b)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1) A value of seven and one half (7.5) percent opacity shall be utilized in lieu of the applicable opacity standard in working through the opacity matrix.

9. Particulate matter emitted from each baghouse shall not exceed 0.1 pounds per hour.

TAPCR 1200-3-19-.11(2)(c)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1) A value of five (5) percent opacity shall be utilized in lieu of the applicable opacity standard in working through the opacity matrix.

10. Visible emissions from baghouses shall not exceed 10% opacity for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period.

TAPCR 1200-3-19-.11(1)(a)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

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11. Particulate matter emitted from each baghouse shall not exceed 0.1 pounds per hour.

TAPCR 1200-3-19-.11(2)(c)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1) A value of five (5) percent opacity shall be utilized in lieu of the applicable opacity standard in working through the opacity matrix.

82-0039-07

Six (6) Spray Booths for Coating Wood Caskets with Exhaust Filter Control

12. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 207.1 tons/year.

TAPCR 1200-3-7-.07(2)

Compliance Method: Record keeping for HAPs shall include the two logs in this condition which contain the following information:

(1) Emissions in tons of each Hazardous Air Pollutant, and (2) Emissions in tons of all Hazardous Air Pollutants, A log of information in the following format, must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. Records shall also be retained to verify the HAP content of each material.

This may include MSDS, formulated data, or other documentation to establish the HAP content. This log must be retained for a period of not less than five years.

LOG 1 - MONTHLY LOG FOR INPUT MATERIALS

MONTH: _____

Material Name	Gallons per Month Usage	VOC Content Pounds of VOC per Gallon	VOC Emissions Tons per Month	HAP 1 Content Pounds per Gallon	HAP 1 Emissions Tons per Year	HAP 2 Content Pounds per Gallon	HAP 2 Emissions Tons per Year	Total HAPs Emitted Tons per Month
TOTAL								

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LOG 2 - YEARLY LOG FOR 82-0039-07

[illegible]

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months]. This log is the total amount of VOCs and HAPs emitted to the air on a 12 month consecutive basis.

13. A report stating the compliance status of this facility with permit condition #12 shall be submitted every 6 months to the address below and shall include the records required by condition #12.

The Technical Secretary
Division of Air Pollution Control
Attention: Operating Permit Program
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Reporting periods will be dated from the end of the first complete calendar quarter following issuance of this permit. Reports shall be submitted within 60 days of the close of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports.

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14. Particulate matter emitted from this source shall not exceed 0.02 grains/dry standard cubic foot (2.39 pounds per hour).

TAPCR 1200-3-7-.04(1)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1) A value of ten (10) percent opacity shall be utilized in lieu of the applicable opacity standard in working through the opacity matrix.

15. Visible emissions from this source shall not exceed 20 percent or greater opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (6 minute average)

TAPCR 1200-3-5-.03(6)

Compliance Method: Compliance with this emission limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996. (Attachment #1)

(END OF CONDITIONS)

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Decision Tree PM for Opacity for Sources Utilizing EPA Method 9

Notes:

PM = Periodic Monitoring
required by 1200-3-9-.02(11)(e)(1)(iii)

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emissions standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission source using this Decision Tree to determine PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants

Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

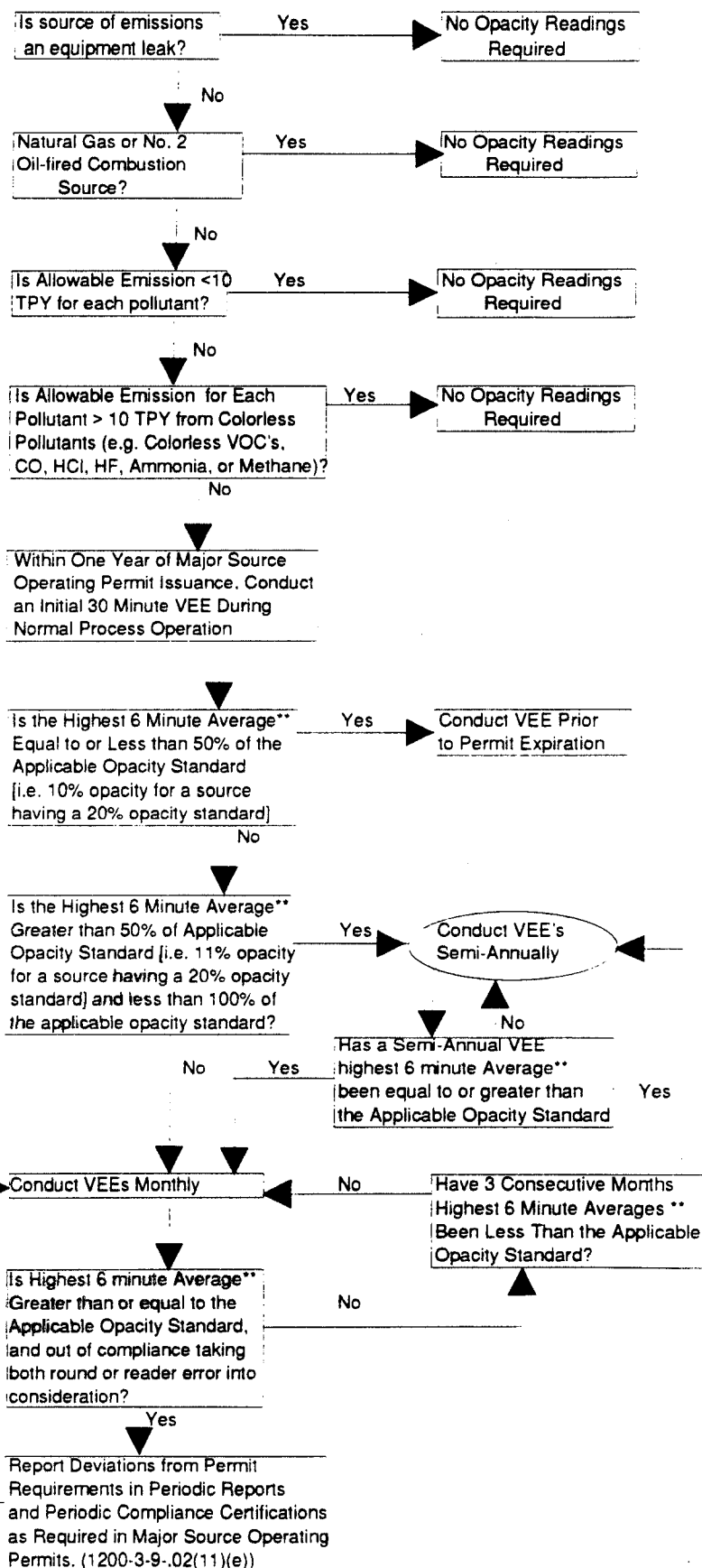
Reader Error

EPA Method 9, Non-NSPS or Neshaps stipulated opacity standards: The TDAPC guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS Stipulated Opacity Standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not Applicable to Asbestos Manufacturing Subject to 40 CFR 61.142

**Or second highest six minute average, if the source has an exemption period stipulated in either the Regulations or in the permit.



**Decision Tree PM for Opacity from
Nontraditional Sources (Roads and Parking Areas)
Utilizing TVEE Method 1**

Notes:

The use of Tennessee Visible Emission Evaluation (TVEE) Method 1 is only applicable where the use of the method is specified as a permit condition.

PM = Periodic Monitoring required by 1200-3-9-.02(11)(e)(1)(iii)

This Decision Tree outlines the criteria by which major sources can meet the PM requirements of Title V for demonstrating compliance with the visible emissions standard for nontraditional sources (roads and parking areas). It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

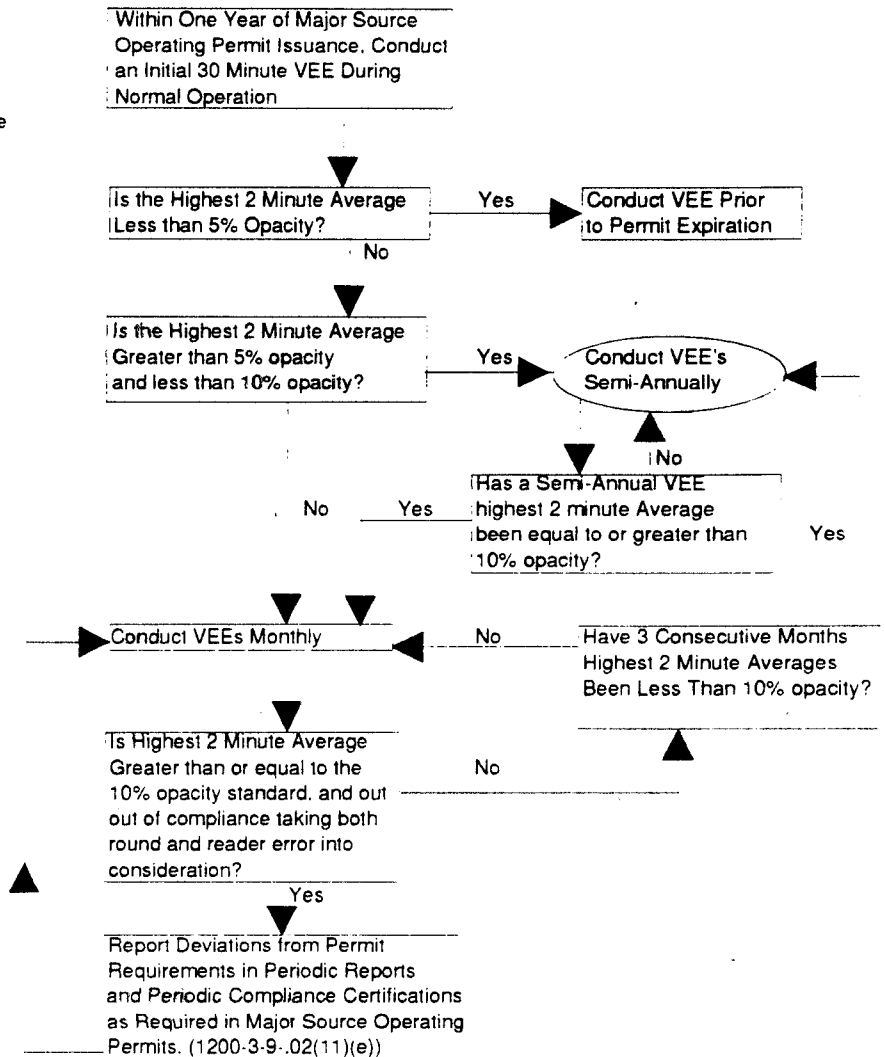
Visible Emission Evaluations (VEEs) are to be conducted utilizing TVEE Method 1. The observer must be properly certified according to criteria specified in TVEE Method 1 to conduct Method 1 evaluations.

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error

For TVEE Method 1, the TDAPC declares non-compliance when the highest two-minute average exceeds the standard plus 10% opacity for sources having this standard applied prior to August 24, 1984 or 8.8% for sources having this standard applied on or after August 24, 1984.



**Decision Tree PM for Opacity for
Sources Subject To Rule 1200-3-5-.01
Utilizing TVEE Method 2**

Notes:

PM = Periodic Monitoring
required by 1200-3-9-.02(11)(e)(iii)

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring requirements of Title V for demonstrating compliance with the visible emission standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission source using this Decision Tree to determine the PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing Tennessee Visible Emission Evaluation Method 2. The observer must be properly certified according to the criteria specified in EPA Method 9 to conduct TVEE Method 2 evaluations.

Typical Pollutants

Particulates, VOC, CO, SO₂, NO_x,
HCl, HF, HBr, Ammonia, and Methane

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

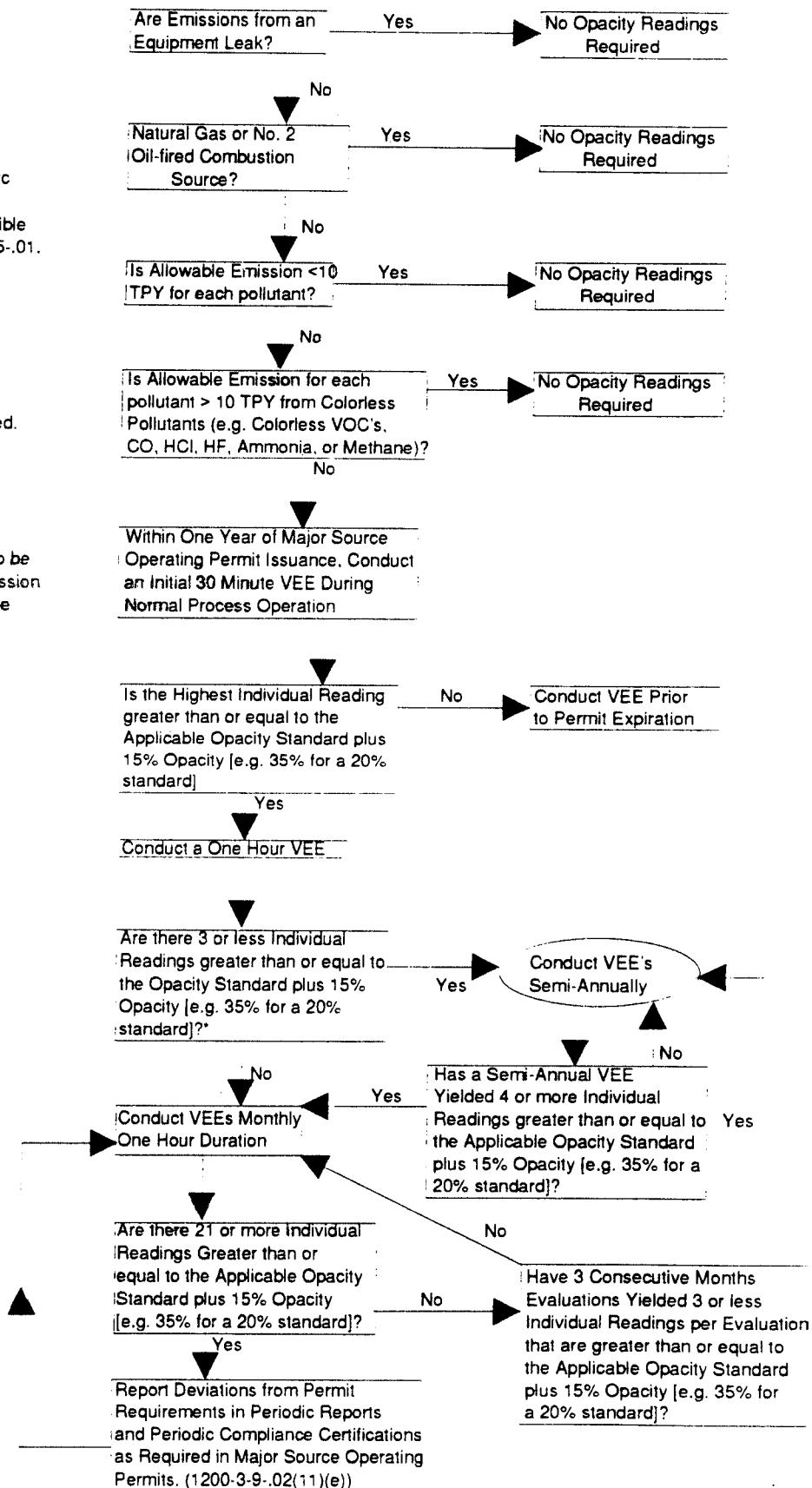
A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error

TVEE Method 2: The TDAPC declares non-compliance when 21 observations are read at the standard plus 15% opacity (e.g. 35% for a 20% standard).

*The rationale for this is the fact that Rule 1200-3-5-.01 allows for an exemption of 5 minutes (20 readings) per hour and up to 20 minutes (80 readings) per day. With 4 or more excessive individual readings per hour the possibility of a daily exceedance exists.

Note: A company could mutually agree to have all of it's sources regulated by EPA Method 9. Caution: Agreement to use Method 9 could potentially place some sources in non-compliance with visible emission standards. Please be sure before you agree.



**Decision Tree PM for Opacity where
the Opacity Standard is Zero Percent
Opacity Utilizing TVEE Method 3**

Notes:

The use of Tennessee Visible Emission Evaluation (TVEE) Method 3 is only applicable where the use of the method is specified as a permit condition.

PM = Periodic Monitoring
required by 1200-3-9-.02(11)(e)(1)(iii)

This Decision Tree outlines the criteria by which major sources can meet the PM requirements of Title V for demonstrating compliance with visible emission standards of zero percent opacity where the use of TVEE Method 3 is specified as a permit condition. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission source using this Decision Tree to determine PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

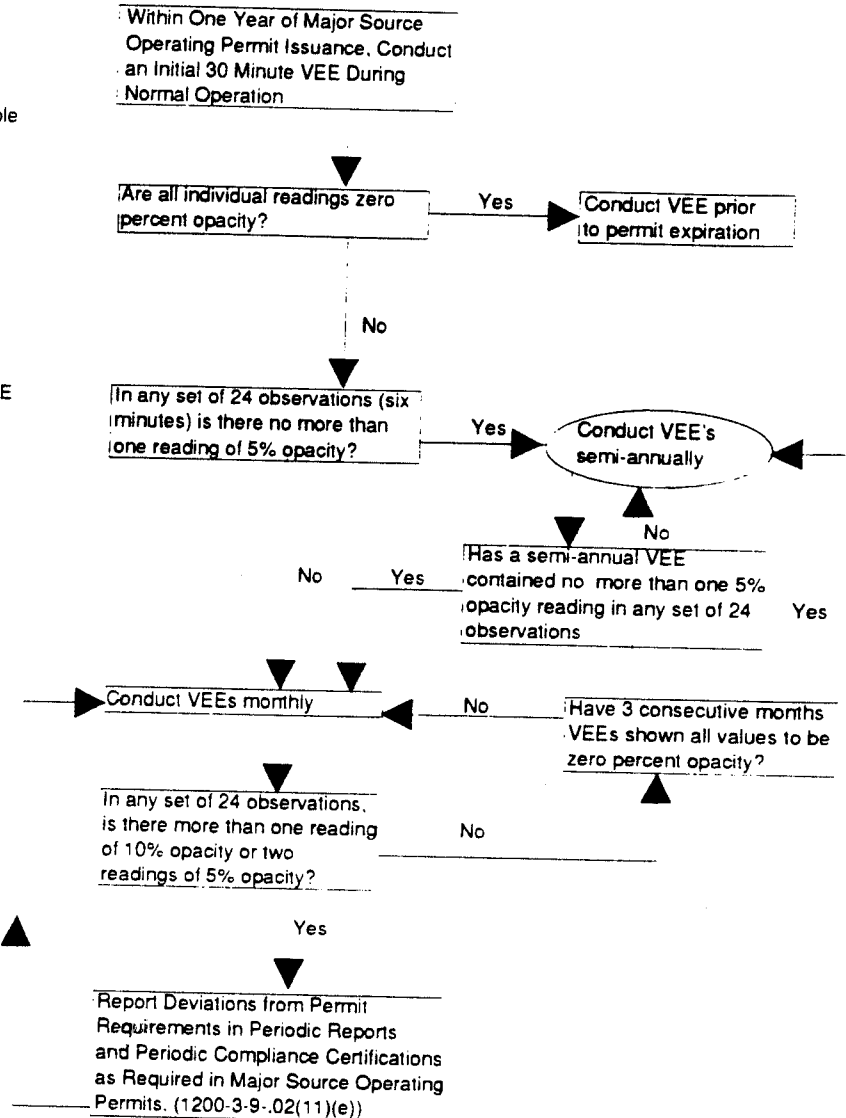
Visible Emission Evaluations (VEEs) are to be conducted utilizing TVEE Method 3. The observer must be properly certified according to criteria specified in TVEE Method 3 to conduct Method 3 evaluations.

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error

For TVEE Method 3, the TDAPC declares non-compliance when during any set of 24 observations any combination of readings exceed 10% opacity. (e.g. one reading of 10% opacity or two readings of 5% opacity)



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DEC - 9 1986

STATE OF TENNESSEE
TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1531

DEC 02 1986

Ms. Carla Pierce
Chief, Operating Permits Section
Environmental Protection Agency, Region IV (APTMD)
Atlanta Federal Center
100 Alabama Street, Southwest
Atlanta, GA 30303

Re: Company No. 82-0039
Permit No. 46211

Dear Ms. Pierce:

Enclosed for your information is a copy of the Major Source
Operating Permit application (Title V) for:

CORTRIM Hardwood Parts Company
1320 Georgia Avenue
Bristol, TN 37620

This transmittal is in accordance with Part 1200-3-9-.02(11)(g)1.
of the Tennessee Air Pollution Control Regulations.

Please feel free to contact Mr. David S. Gosslee at 615-532-0599 or
Mr. Tupili Reddy at 615-532-0589, if you have any questions or
comments concerning this source.

Sincerely,

for *T Reddy*
John W. Walton, P.E.
Director
Division of Air Pollution Control

Enclosures - a copy of the application



PORTRIM

Hardwood Parts Company



P.O. BOX 919 BRISTOL, TENNESSEE 37621 OR 1320 GEORGIA AVE. BRISTOL, TENNESSEE 37620

MANUFACTURERS OF HIGH QUALITY GLUED-UP DIMENSION AND WOOD PARTS FROM APPALACHIAN HARDWOODS
JAMES E. ELLER, GENERAL MANAGER FAX 423-764-6241 PHONE 423-764-6127

November 7, 1996

CERTIFIED MAIL -- Z 394 745 090
RETURN RECEIPT REQUESTED

John Walton, P.E., Technical Secretary
Tennessee Air Pollution Control Board
Department of Environment and Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

RE: Title V Permit Application -- 82-0039

Dear Mr. Walton:

Please find the enclosed Title V application for your consideration. Also, included is 3-1/2" disk containing the electronic version of the application and a ballot declaring our fee choice.

We would like to formally request a Permit Shield for this facility.

I have come across only one small error in the electronic version of the forms that I cannot correct. The electronic version consistently states that Form V.32 is incomplete. We did not fill out a V.32. Since this is a very minor program error, I have ignored the message and alerted Stan Lodl of the problem.

If you have any questions concerning this application, please feel free to call me at (423) 764-6127.

Respectfully,

Robin L. Price
Project Engineer

RLP/rlp
Enclosures (98)

96 NOV 14 P2:54
TENNESSEE AIR POLLUTION CONTROL DIVISION

ATTENTION: FEES SECTION

BALLOT TO DECLARE MAJOR SOURCE FEE CHOICE

Facility Name: CORTRIM HARDWOOD PARTS CO.

Company Number (from cover letter): 82-0039

☐ I choose to have my facility pay its major source annual emission fee calculated on an allowable emission basis.

☒ I choose to have my facility pay its major source annual emission fee calculated on an actual emission basis.*

☐ I choose to have my facility pay its major source annual emission fee calculated on a mixture basis of actual emission and allowable emissions. I have listed all source that I wish to be subject to actual based emission fees.*

* In narrative form, please provide the procedures you feel are reasonable to quantify your actual emissions. The procedure should be verifiable and replicable. We are asking for your help in this matter to determine what is reasonable. Please attach separate pages as needed with the facility name and file number on each page.

ROBERT D. SPIEGLE JR.
Name of Responsible Official

NOV. 11, 1996
Date

Robert D. Spiegel Jr.
Signature

MAJOR SOURCE OPERATING PERMIT APPLICATION: FACILITY IDENTIFICATION
INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

98NOV 14 P2: 54

1. ADMINISTRATION

This Application contains the following forms:	APC Form V.1, Facility Identification	1
	APC Form V.2, Operations and Flow Diagrams	1

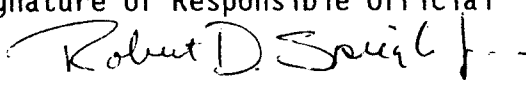
2. EMISSIONS SOURCE DESCRIPTION

This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form V.3, Stack Identification	15
	APC Form V.4, Fuel Burning Non-Process Equipment	2
	APC Form V.5, Stationary Gas Turbines or Internal Combustion Engines	N/A
	APC Form V.6, Storage Tanks	N/A
	APC Form V.7, Incinerators	N/A
	APC Form V.8, Printing Operations	N/A
	APC Form V.9, Painting and Coating Operations	1
	APC Form V.10, Miscellaneous Processes	2
	APC Form V.33, Stage I and Stage II Vapor Recovery Equipment	N/A
	APC Form V.34, Open Burning	N/A

3. AIR POLLUTION CONTROL SYSTEM

This application contains the following forms (one form for each control system in use at the facility):	APC Form V.11, Control Equipment - Miscellaneous	2
	APC Form V.12, Condensers	N/A
	APC Form V.13, Adsorbers	N/A
	APC Form V.14, Catalytic or Thermal Oxidation Equipment	N/A
	APC Form V.15, Cyclone/Settling Chambers	3
	APC Form V.16, Electrostatic Precipitators	N/A
	APC Form V.17, Wet Collection Systems	N/A
	APC Form V.18, Baghouse/Fabric Filters	4

MAJOR SOURCE OPERATING PERMIT APPLICATION: FACILITY IDENTIFICATION
INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

4. COMPLIANCE DEMONSTRATION		TOTAL NUMBER OF THIS FORM
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form V.19, Compliance certification - Monitoring, and Reporting - Description of Methods for Determining Compliance	4
	APC Form V.20, Continuous Emissions Monitoring	N/A
	APC Form V.21, Portable Monitors	N/A
	APC Form V.22, Control System Parameters or Operational Parameters of a Process	3
	APC Form V.23, Monitoring Maintenance Procedures	4
	APC Form V.24, Stack Testing	N/A
	APC Form V.25, Fuel Sampling and Analysis	N/A
	APC Form v.26, Record Keeping	2
	APC Form V.27, Other Methods	1
	APC Form V.28, Emissions from Process Emissions Sources/ Fuel Burning Installations/ Incinerators	5
	APC Form V.29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form V.30, Current Emissions Requirements and Status	5
	APC Form V.31, Compliance Plan and Compliance Certification	1
APC Form V.32, Air Monitoring Network	N/A	
5. STATEMENT OF COMPLETENESS AND CERTIFICATION OF COMPLIANCE <p>I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of 96 pages and they are numbered from page 1 to 57. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.</p>		
Name and Title of Responsible Official Robert D. Spiegle, Jr. President/Owner		Telephone Number with Area Code (423) 764-6127
Signature of Responsible Official 		Date of Application 11/08/96
(FOR DEFINITION OF RESPONSIBLE OFFICIAL, SEE INSTRUCTIONS FOR APC FORM V.1)		

MAJOR SOURCE OPERATING PERMIT APPLICATION: FACILITY IDENTIFICATION

1. FACILITY NAME AND OWNER'S NAME IF DIFFERENT FROM THE FACILITY NAME: Cortrim Hardwood Parts Company		FOR APC	APC CO. #															
MAILING ADDRESS (ST/RD/P.O. BOX): P.O. Box 919		-->	LOG/PERMIT#															
CITY, STATE, ZIP CODE: Bristol TN 37621		USE ONLY -->																
2. FACILITY LOCATION (ST/RD/HWY): 1320 Georgia Avenue		COUNTY NAME: Sullivan																
CITY OR DISTANCE TO NEAREST TOWN, ZIP CODE: Bristol, TN 37620		TELEPHONE NO. WITH AREA CODE: (423)764-6127																
3. FACILITY'S PRIMARY ACTIVITY AND THE FIRST TWO DIGITS OF THE FACILITY SIC CODE(S): MISCELLANEOUS MANUFACTURING INDUSTRIES 39																		
4. CONTACT PERSON'S NAME FOR THIS PERMIT: TITLE: Robin L. Price Project Engineer		TELEPHONE NO. WITH AREA CODE: (423)764-6127																
5. IF FACILITY IS LOCATED IN AN AREA DESIGNATED AS "NONATTAINMENT" OR "ADDITIONAL CONTROL", INDICATE THE POLLUTANT(S) FOR THE DESIGNATION. N/A																		
6. LIST ALL VALID AIR POLLUTION PERMITS ISSUED TO THE SOURCES CONTAINED IN THIS IN THIS APPLICATION (IDENTIFY ALL PERMITS WITH MOST RECENT PERMIT NUMBERS AND EMISSION SOURCE REFERENCE NUMBERS LISTED ON THE PERMIT(S)).																		
<table border="0"> <tr> <td>Wood Waste Boilers #1 & #2</td> <td>034930F</td> <td>82-0039-01</td> </tr> <tr> <td>Scotch Marine Boiler</td> <td>028351F</td> <td>82-0039-02</td> </tr> <tr> <td>Woodworking Operations, Plant I</td> <td>037802P</td> <td>82-0039-03</td> </tr> <tr> <td>Woodworking Operations, Plant II</td> <td>037803P</td> <td>82-0039-06</td> </tr> <tr> <td>Six Spray Booths/Exhaust Filter Con</td> <td>042854P</td> <td>82-0039-07</td> </tr> </table>				Wood Waste Boilers #1 & #2	034930F	82-0039-01	Scotch Marine Boiler	028351F	82-0039-02	Woodworking Operations, Plant I	037802P	82-0039-03	Woodworking Operations, Plant II	037803P	82-0039-06	Six Spray Booths/Exhaust Filter Con	042854P	82-0039-07
Wood Waste Boilers #1 & #2	034930F	82-0039-01																
Scotch Marine Boiler	028351F	82-0039-02																
Woodworking Operations, Plant I	037802P	82-0039-03																
Woodworking Operations, Plant II	037803P	82-0039-06																
Six Spray Booths/Exhaust Filter Con	042854P	82-0039-07																
7. PERMIT REQUESTED FOR: INITIAL APPLICATION TO OPERATE:_Y_ MODIFICATION:_N_ REVISION (ADMINISTRATIVE AMENDMENTS):_N_ RELOCATION TO OPERATE:_N_ PERMIT RENEWAL TO OPERATE:_Y_																		
8. OWNER'S REGISTERED AGENT'S NAME & ADDRESS FOR SERVICE OF PROCESS James E. Eller, General Manager 118 Hampton Drive Bristol TN 37620		PHONE # WITH AREA CODE (423)764-7358																
9. IS THIS FACILITY SUBJECT TO THE PROVISIONS GOVERNING PREVENTION OF ACCIDENTAL RELEASES OF HAZARDOUS AIR CONTAMINANTS CONTAINED IN CHAPTER 1200-3-32 OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF THE ANSWER IS YES, ARE YOU IN COMPLIANCE WITH THE PROVISIONS OF CHAPTER 1200-3-32 OF THE TENNESSEE AIR POLLUTIONS CONTROL REGULATIONS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																		
10. PAGE NUMBER 1		REVISION NUMBER: N/A DATE OF REVISION: N/A																

MAJOR SOURCE OPERATING PERMIT APPLICATION - OPERATIONS AND FLOW DIAGRAMS

1. PLEASE LIST, IDENTIFY AND DESCRIBE BRIEFLY PROCESS EMISSION SOURCES, FUEL BURNING INSTALLATIONS, AND INCINERATORS THAT ARE CONTAINED IN THIS APPLICATION. PLEASE ATTACH A FLOW DIAGRAM FOR THIS APPLICATION.

Wood Waste Boilers #1 & #2 (82-0039-01)

Diagram 1A: Saw dust, wood shavings and chips are augered out of the shaving storage bin and fed into two horizontal return tube Wood Waste Boilers in suspension. Emissions are controlled by a Zurn Fly-Ash Arrestor unit which reinjects unburned particulate back into fireboxes for reburning. Individual stacks or emission sources are: Stack #7 -- Wood Waste Boilers #1 & #2 (Common Stack).

Scotch Marine Boiler (82-0039-02)

Diagram 2A: Standby package boiler burns Natural Gas or #2 Oil if and when wood waste runs out. Individual stacks or emission sources are: Stack #8 -- Scotch Marine Boiler.

Wood Working Operations, Plant I (82-0039-03)

Diagram 3A: Wood waste collection system where saw dust, wood shavings and chips are drawn off machines in suspension, separated from air in cyclone separators and baghouse filters. Dust is then collected in a shaving bin for short term storage. Individual stacks or emission points are:

- #1 Carter Day Baghouse Filters -- Model No. 144RJ84 (In use, air returned to plant in winter.)
- #2 Carter Day Baghouse Filters -- Model No. 144RJ84 (In use, air returned to plant in winter.)
- #3 12'6" Cyclone Type Separator (In Use)
- #4 20'0" Cyclone Type Separator (In Use but capped.)
- #5 13'0" Cyclone Type Separator (NOT IN USE, but available).
- #6 Moldow Baghouse Filter (In Use, air returned to plant in winter).

(CONTINUED IN ATTACHMENT "A")

2. LIST ALL INSIGNIFICANT ACTIVITIES WHICH ARE EXEMPTED BECAUSE OF SIZE OR PRODUCTION RATE AND CITE THE APPLICABLE REGULATIONS.

3. ARE THERE ANY STORAGE PILES?

YES _____

NO X

4. LIST THE STATES THAT ARE WITHIN 50 MILES OF YOUR FACILITY

Virginia, North Carolina and Kentucky

5. PAGE NUMBER: 2

REVISION NUMBER: N/A

DATE OF REVISION: N/A

1. LIST OF PROCESS EMISSION SOURCES AND DESCRIPTIONS (CONTINUED).

Wood Working Operations, Plant II (82-0039-06)

Diagram 1B: Wood waste collection system where saw dust, wood shavings and chips are drawn off machines in suspension, separated from air using baghouse filters and collected in a portable bin for transfer to shaving bin at Plant I. Individual stacks or emission points are as follows:

#9 Carter Day Baghouse Filters -- Model No. 144RJ84 (In use, air returned to plant in winter.)

Six Spray Booths (82-0039-07)

Diagram 2B: Assembled caskets are stained, filled, sealed and coated with oil-based, lacquer and water based spray coating. Filling and staining occurs in spray room. Fresh air is introduced into spray room from three Natural Gas fired Make-Up Units, and all emissions are expelled through the Six Spray Booth Stacks. Individual stacks or emission points are as follows:

- #10 -- Filtered Spray Booth Stack
- #11 -- Filtered Spray Booth Stack
- #12 -- Filtered Spray Booth Stack
- #13 -- Filtered Spray Booth Stack
- #14 -- Filtered Spray Booth Stack
- #15 -- Filtered Spray Booth Stack

Major Source Operating Permit Applications Operations and Flow Diagrams

Diagram 1A -- Wood Waste Boilers #1 & #2 (82-0039-01)

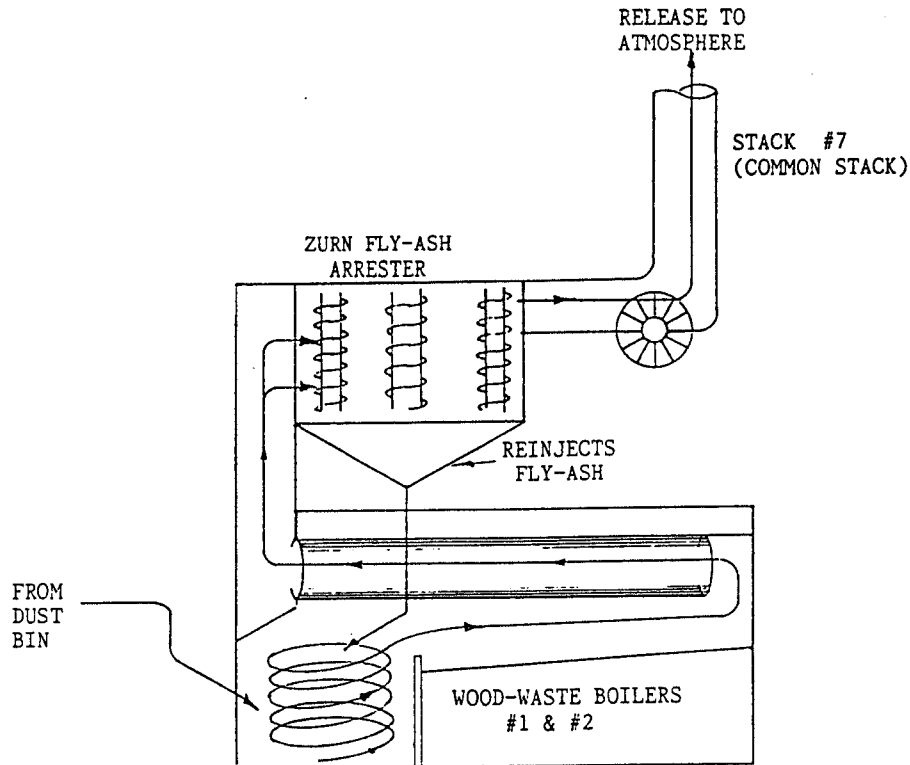
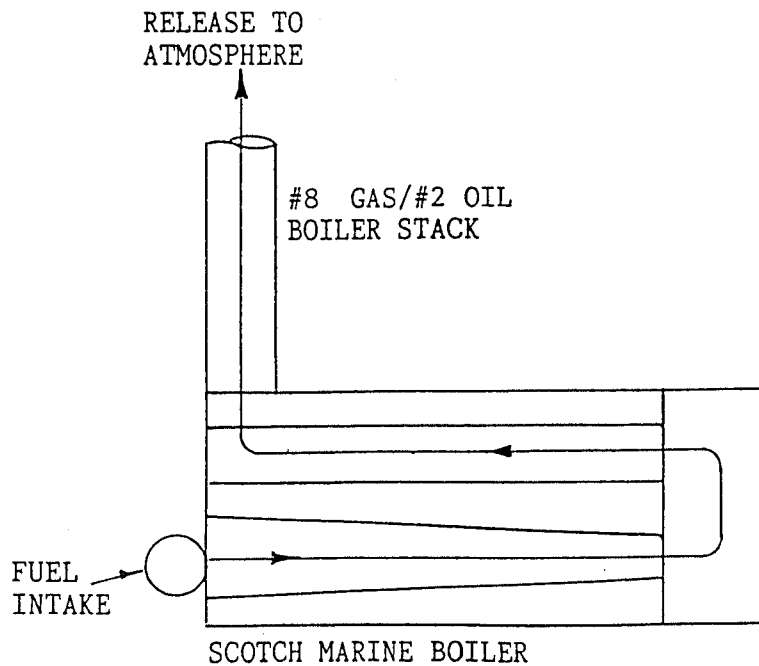


Diagram 2A -- Scotch Marine Boiler (82-0039-02)



Major Source Operating Permit Applications Operations and Flow Diagrams (cont.)

Diagram 3A -- Wood Working Operations, Plant I (82-0039-03)

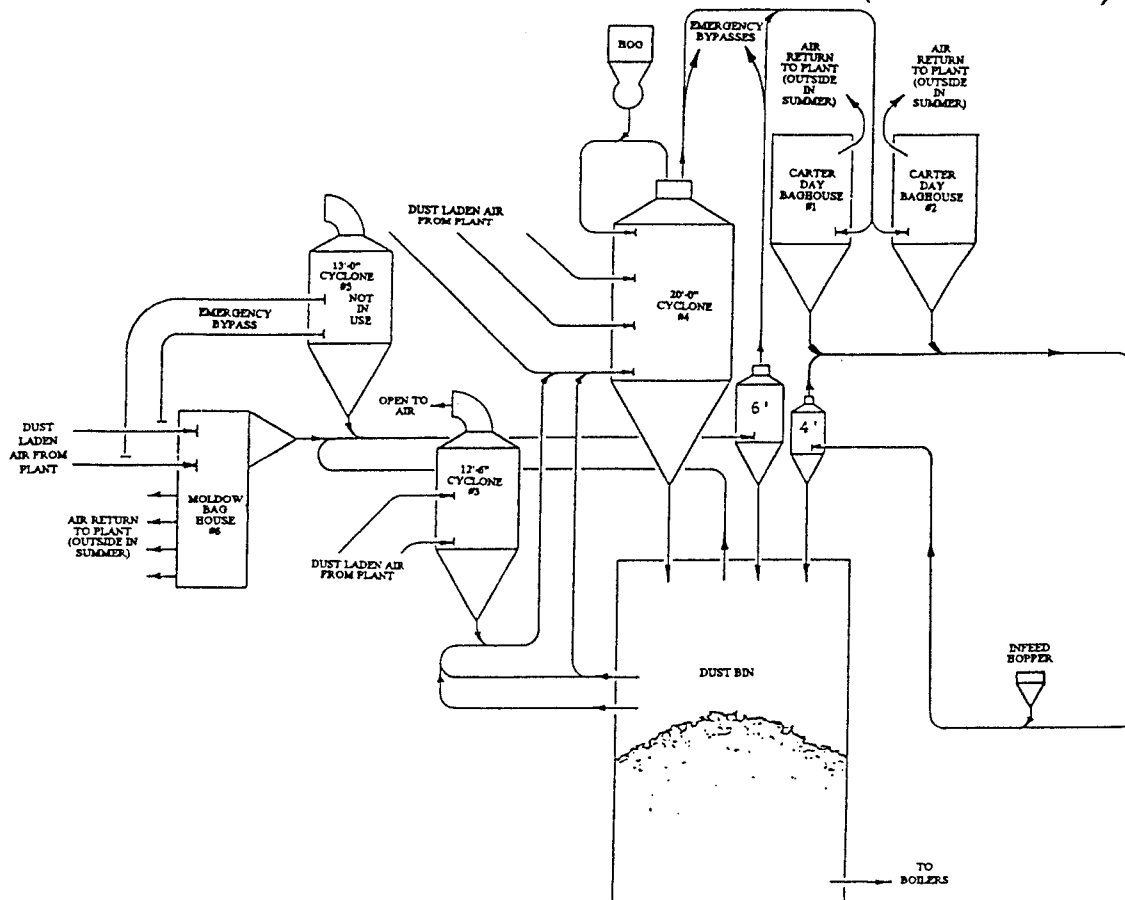
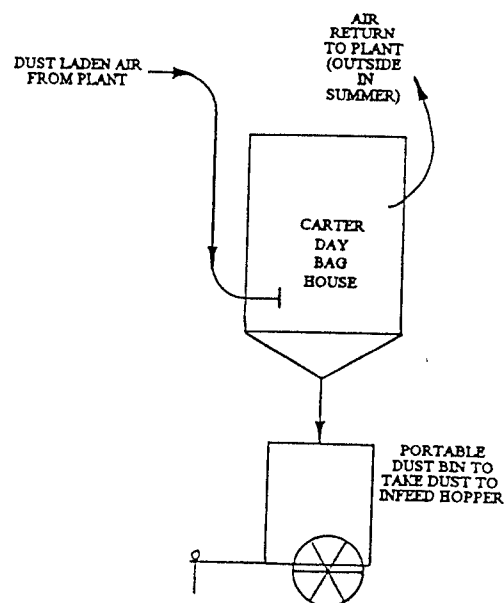
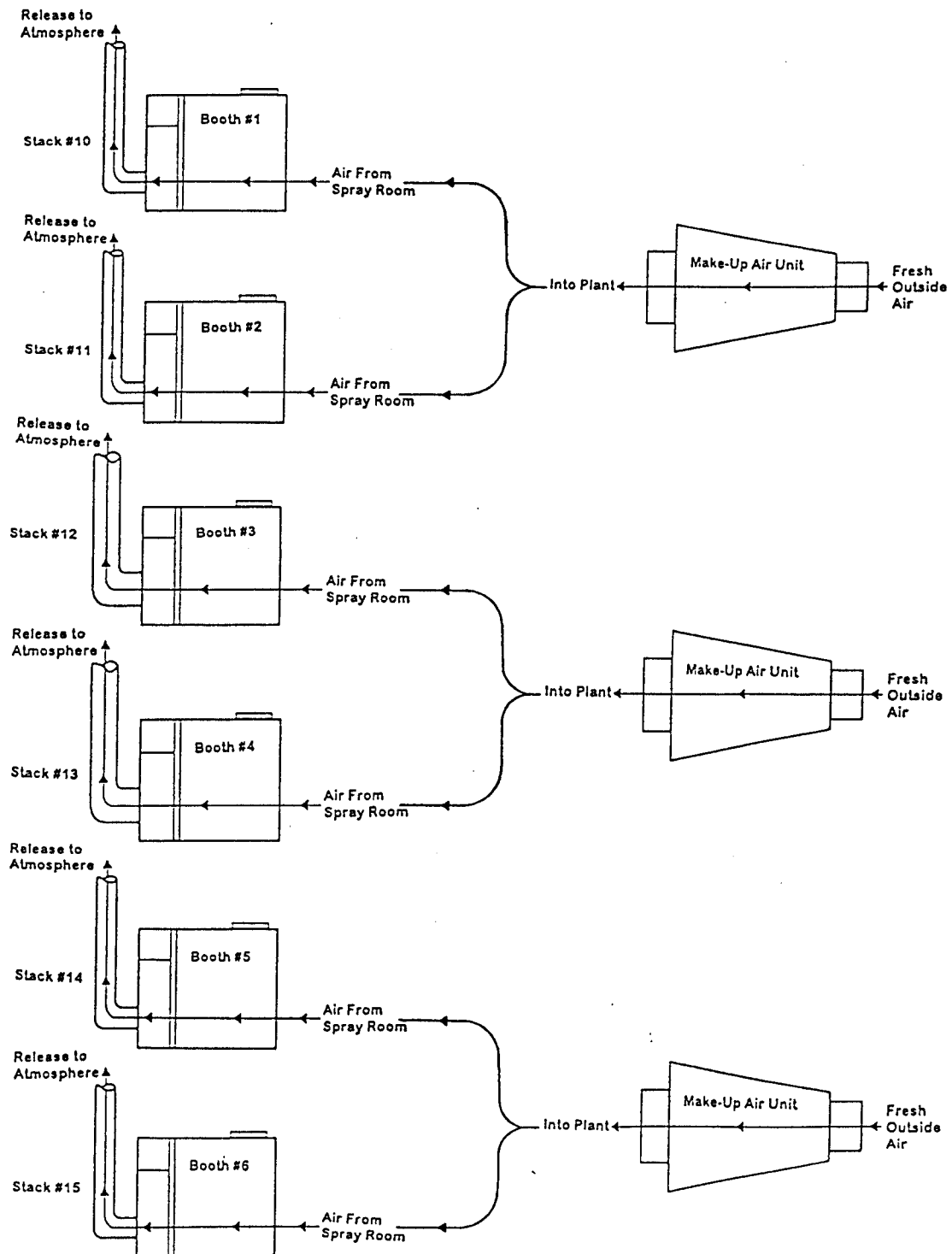


Diagram 1B -- Wood Working Operations, Plant II (82-0039-06)



Major Source Operating Permit Applications Operations and Flow Diagrams (cont.)

Diagram 2B -- Six Spray Booths (82-0039-07)



MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		95NOV 14 P2:55 10 . . .	FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #1 Diagram 3A			USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Carter Day Baghouse #1, Plant I (-03)				
4. STACK HEIGHT ABOVE GRADE IN FEET: 28.60				
5. VELOCITY (DATA AT EXIT CONDITIONS): 48.5 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 8.0 X 2.1		
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 48890		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 44180		
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)		
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)				
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO ₂ , NO _x , etc.)? N/A				
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.				
13. DO YOU HAVE A BYPASS STACK? <input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. Damper at top of 20' cyclone(see page #6). Conditions for use: Emergency/Fire				
14. PAGE NUMBER: 3 REVISION NUMBER: N/A DATE OF REVISION: N/A				

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		96NOV 14 P2:55	FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #2 Diagram 3A			USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Carter Day Baghouse #2, Plant I (-03)				
4. STACK HEIGHT ABOVE GRADE IN FEET: 28.60				
5. VELOCITY (DATA AT EXIT CONDITIONS): 48.5 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 8.0 X 2.1		
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 48890		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 44180		
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)		
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)				
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A				
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.				
13. DO YOU HAVE A BYPASS STACK? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. Damper at top of 20' Cyclone(see page #6). Conditions for use: Emergency/Fire				
14. PAGE NUMBER: 4		REVISION NUMBER: N/A		DATE OF REVISION: N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		96 NOV 14 P 2: 56	FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #3 Diagram 3A			USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): 12'6" Cyclone (82-0039-03)				
4. STACK HEIGHT ABOVE GRADE IN FEET: 57.00				
5. VELOCITY (DATA AT EXIT CONDITIONS): 21.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 5.3		
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 27800		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 25120		
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)		
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)				
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A				
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.				
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A				
14. PAGE NUMBER: 5 REVISION NUMBER: N/A DATE OF REVISION: N/A				

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #4 Diagram 3A		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): 20' Cyclone (82-0039-03)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 55.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 63.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 4.5 X 5.8	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 97810		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 88390	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 6		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #5 Diagram 3A		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): 13' Cyclone (82-0039-03) NOT IN USE			
4. STACK HEIGHT ABOVE GRADE IN FEET: 57.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 25.4 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 5.0	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 29920		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 27040	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 7		REVISION NUMBER: N/A	
DATE OF REVISION: N/A			

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #6 Diagram 3A		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Moldow Baghouse (82-0039-03)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 55.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 28.3 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.0 X 8.8	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 29880		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 27010	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. 13' Cyclone (See page 7) Conditions for use: Emergency/Fire			
14. PAGE NUMBER: 8		REVISION NUMBER: N/A DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #7 Diagram 1A		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Wood Waste Boilers #1 & #2 (82-0039-01)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 55.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 60.4 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.5	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 17790		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 9810	
9. EXHAUST TEMPERATURE: 408 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.53_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 9		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #8 Diagram 2A		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Scotch Marine Boiler (82-0039-02)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 24.2 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 1.7	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 3300		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 2130	
9. EXHAUST TEMPERATURE: 280 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.47_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 10		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #9 Diagram 1B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Carter Day Baghouse, Plant II (-06)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 12.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 45.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 3.2 X 3.7	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 31970		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 28890	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 11		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #10 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #1 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 45.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.0	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 8500		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 7680	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 12		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #11 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #2 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 45.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.0	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 8500		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 7680	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO ₂ , NO _x , etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 13		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #12 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #3 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 21.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.5	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 6300		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 5690	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 14		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #13 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #4 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 21.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.5	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 6300		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 5690	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 15		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #14 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #5 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 45.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.0	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 8500		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 7680	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 16		REVISION NUMBER: N/A	
		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - STACK IDENTIFICATION

1. FACILITY NAME : Cortrim Hardwood Parts Company		FOR APC -->	APC CO. #
2. STACK ID (OR FLOW DIAGRAM POINT IDENTIFICATION): #15 Diagram 2B		USE ONLY -->	LOG/PERMIT#
3. EMISSION SOURCE (IDENTIFY): Spray Booth #6 (82-0039-07)			
4. STACK HEIGHT ABOVE GRADE IN FEET: 40.00			
5. VELOCITY (DATA AT EXIT CONDITIONS): 45.0 (ACTUAL FEET PER SECOND)		6. INSIDE DIMENSIONS AT OUTLET IN FEET: 2.0	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS (ACFM): 8500		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 7680	
9. EXHAUST TEMPERATURE: 68 DEGREES FAHRENHEIT (°F)		10. MOISTURE CONTENT (DATA AT EXIT CONDITIONS): GRAINS PER DRY STANDARD CUBIC _0.74_ PERCENT _N/A_ FOOT (gr/dscfm)	
11. EXHAUST TEMPERATURE THAT IS EQUALLED OR EXCEEDED DURING NINETY (90) PERCENT OR MORE OF THE OPERATING TIME (FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY): N/A (°F)			
12. IF THIS STACK IS EQUIPPED WITH CONTINUOUS POLLUTANT MONITORING EQUIPMENT REQUIRED FOR COMPLIANCE, WHAT POLLUTANT(S) DOES THIS EQUIPMENT MONITOR (e.g., OPACITY, SO2, NOX, etc.)? N/A			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9 OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES ___X___ NO IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER(S) OR FLOW DIAGRAM POINT NUMBER(S) EXHAUSTING THROUGH THIS BYPASS STACK. N/A			
14. PAGE NUMBER: 17		REVISION NUMBER: N/A DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION - FUEL BURNING NON-PROCESS EQUIPMENT

1. FACILITY NAME: Cortrim Hardwood Parts Company				
2. LIST ALL FUEL-BURNING EQUIPMENT THAT IS AT THIS FUEL BURNING INSTALLATION (PLEASE COMPLETE AN APC V.4 FORM FOR EACH PIECE OF FUEL BURNING EQUIPMENT). <div style="margin-left: 40px;"> -01 Wood Waste Boilers #1 & #2 (82-0039-01) -02 Scotch Marine Boiler (82-0039-02) </div>				
3. FUEL BURNING EQUIPMENT IDENTIFICATION NUMBER: -01		4. STACK ID OR FLOW DIAG. POINT ID(S): #7 Diagram 1A		
5. FUEL BURNING EQUIPMENT DESCRIPTION: Wood Waste Boilers #1 & #2 (82-0039-01) Saw dust, wood shavings and chips are augered out of a storage bin and fed into two horizontal return tube wood waste boilers in suspension. Wood waste boiler emissions are controlled by a Zurn Fly-Ash arrestor unit which reinjects unburned particulate matter back into fire boxes for reburning.				
6. DATE OF INSTALLATION OR LAST MODIFICATION OF FUEL BURNING EQUIPMENT: 10/24/79				
7. FURNACE TYPE: Cyclone -- Wood Fired, Sawdust & Chips burned in suspension		8. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Erie City Iron Works Walsh & Widener Casings National Board #7849 & #7855		
9. MAXIMUM RATED HEAT INPUT CAPACITY (IN MILLION BTU/HOUR): 15.82		10. IF WOOD IS USED AS A FUEL, SPECIFY THE AMOUNT OF WOOD USED AS A FRACTION OF TOTAL HEAT INPUT. 99.99		
11. FUELS:	PRIMARY FUEL	BACKUP FUEL #1	BACKUP FUEL #2	BACKUP FUEL #3
FUEL NAME	Wood Waste	N/A	N/A	N/A
ACTUAL YEARLY CONSUMPTION	1000.000 TON	N/A	N/A	N/A
Units are: FT3, GAL, TON or MMF(million ft3), MGL(thou. gal.), MTN(thou. tons)				
12. IF EMISSIONS FROM THIS FUEL BURNING EQUIPMENT ARE CONTROLLED FOR COMPLIANCE, PLEASE SPECIFY TYPE OF CONTROL: Zurn Fly-Ash Arrestor, Regular Maintenance Procedures, and Visual Monitoring for Up-Set.				
13. IF EMISSIONS FROM THIS FUEL BURNING EQUIPMENT ARE MONITORED FOR COMPLIANCE, PLEASE SPECIFY TYPE MONITORING: Visual monitoring for opacity on a yearly basis by State and on a regular basis by employees for Up-Set.				
14. LOCATION OF THIS FUEL BURNING INSTALLATION IN UTM COORDINATES: UTM VERTICAL: 4048.80 UTM HORIZONTAL: 395.95				
15. NORMAL OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WK 339 DAYS/YR * SEE ATTACHMENT FOR ITEM 15, OPERATING SCHEDULE				
16. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS, SUCH AS OUTDOOR STORAGE PILES, OPEN CONVEYORS, MATERIAL HANDLING OPERATIONS, etc. (PLEASE ATTACH A SEPARATE SHEET IF NECESSARY). <div style="margin-left: 40px;"> 1. Occasional upset due to fire or dust leaks in system (sawdust). 2. Boiler/water blowdown (steam). </div>				
17. PAGE NUMBER: 18 REVISION NUMBER: N/A DATE OF REVISION: N/A				

MAJOR SOURCE OPERATING PERMIT APPLICATION: FUEL BURNING NON-PROCESS EQUIPMENT
APC V.04

ATTACHMENT A

15. NORMAL OPERATING SCHEDULE (SPECIAL SCHEDULE).
SOURCE ID: -01

Normal operating schedule will vary according to the availability of wood waste. Amount listed is the maximum amount of operation time including a 14 day total shut down for maintenance and repair plus 6 days per year for cleaning and inspections.

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - MISCELLANEOUS

<p>1. FACILITY NAME: Cortrim Hardwood Parts Company</p>	<p>2. EMISSION SOURCE ID: 82-0039-01 (Wood Waste Boilers #1 & #2)</p>																		
<p>3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): #7 Diagram 1A</p>																			
<p>4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Zurn Fly-Ash Arrestor (82-0039-01) Collects and reinjects ash into boilers to be reburned. Flow Rate: 17,790 ACFM Temperature: 408 degrees Fahrenheit</p>																			
<p>5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Zurn Air Systems</p>																			
<p>6. DATE OF INSTALLATION: 07/10/73</p>																			
<p>7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 55%;">POLLUTANT</th> <th style="width: 10%;">EFFIC (%)</th> <th style="width: 35%;">SOURCE OF DATA</th> </tr> </thead> <tbody> <tr> <td>FUGITIVE EMISSIONS - ASH AND UNBURNED WOOD DUST</td> <td>98.0</td> <td>Testing by State Sampling Team</td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		POLLUTANT	EFFIC (%)	SOURCE OF DATA	FUGITIVE EMISSIONS - ASH AND UNBURNED WOOD DUST	98.0	Testing by State Sampling Team	N/A			N/A			N/A			N/A		
POLLUTANT	EFFIC (%)	SOURCE OF DATA																	
FUGITIVE EMISSIONS - ASH AND UNBURNED WOOD DUST	98.0	Testing by State Sampling Team																	
N/A																			
N/A																			
N/A																			
N/A																			
<p>8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Fly-Ash and unburned wood dust is reinjected into fire boxes on boilers to be reburned.</p>																			
<p>9. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A</p>																			
<p>13. PAGE NUMBER: 19 REVISION NUMBER: N/A DATE OF REVISION: N/A</p>																			

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

ALL SOURCES THAT ARE SUBJECT TO 1200-3-9-.02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS ARE REQUIRED TO CERTIFY COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY INCLUDING A STATEMENT WITHIN THE PERMIT APPLICATION OF THE METHODS USED FOR DETERMINING COMPLIANCE. THIS STATEMENT MUST INCLUDE A DESCRIPTION OF THE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS. IN ADDITION, THE APPLICATION MUST INCLUDE A SCHEDULE FOR COMPLIANCE CERTIFICATION SUBMITTALS DURING THE PERMIT TERM. THESE SUBMITTALS MUST BE NO LESS FREQUENT THAN ANNUALLY AND MAY NEED TO BE MORE FREQUENT IF SPECIFIED BY THE UNDERLYING APPLICABLE REQUIREMENT OR THE TECHNICAL SECRETARY.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. PROCESS EMISSION SOURCE, FUEL BURNING INSTALLATION, OR INCINERATOR (IDENTIFY):
Wood Waste Boilers #1 & #2 (82-0039-01)

3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):
Stack #7, Diagram 1A

4. THIS SOURCE AS DESCRIBED UNDER ITEM #2 OF THIS APPLICATION WILL USE THE FOLLOWING METHOD(S) FOR DETERMINING COMPLIANCE WITH APPLICABLE REQUIREMENTS (AND SPECIAL OPERATING CONDITIONS FROM AN EXISTING PERMIT). CHECK ALL THAT APPLY AND ATTACH APPROPRIATE FORM(S).

- CONTINUOUS EMISSIONS MONITORING (CEM) - APC FORM V.20
POLLUTANT(S):
N/A
- EMISSION MONITORING USING PORTABLE MONITORS - APC FORM V.21
POLLUTANT(S):
N/A
- MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS - APC FORM V.22
POLLUTANT(S):
N/A
- X- MONITORING MAINTENANCE PROCEDURES - APC FORM V.23
POLLUTANT(S):
Unburned Wood Dust and Fly-Ash
- STACK TESTING - APC FORM V.24
POLLUTANT(S):
N/A
- FUEL SAMPLING & ANALYSIS (FSA) - APC FORM V.25
POLLUTANT(S):
N/A
- X- RECORDKEEPING - APC FORM V.26
POLLUTANT(S):
Unburned Wood Dust and Fly-Ash
- X- OTHER (PLEASE DESCRIBE) - APC FORM V.27
POLLUTANT(S):
Unburned Wood Dust and Fly-Ash

5. COMPLIANCE CERTIFICATION REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V Permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

6. COMPLIANCE MONITORING REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V Permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

7. PAGE NUMBER: 20

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY MONITORING MAINTENANCE PROCEDURES

THE MONITORING OF A MAINTENANCE PROCEDURE SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME:	Cortrim Hardwood Parts Company	
2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATIONS(S):	Stack #7, Diagram 1A	
3. EMISSION SOURCE:	Wood Waste Boilers #1 & #2 (82-0039-01)	
4. POLLUTANT(S) BEING MONITORED:	Unburned wood dust and Fly-Ash.	
5. PROCEDURE BEING MONITORED:	Daily boiler blowdown, periodic cleaning and repair.	
6. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:	Tubes are blowdown once a week. Fire boxes are cleaned and tubes are scrubbed once every eight weeks. Once a year boilers are shut down, totally cleaned, refractory is repaired and entire system is inspected by a certified boiler specialist.	
7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):	One year after receipt of Title V permits and once a year thereafter.	
8. PAGE NUMBER: 21	REVISION NUMBER: N/A	DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY RECORDKEEPING

RECORDKEEPING SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PARAMETER VALUE RECORDED AND THE APPLICABLE REQUIREMENT IS ESTABLISHED.

1. FACILITY NAME:

Cortrim Hardwood Parts Company

2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):

Stack #7, Diagram 1A

3. EMISSION SOURCE (IDENTIFY):

Wood Waste Boilers #1 & #2 (82-0039-01)

4. POLLUTANT(S) OR PARAMETER BEING MONITORED:

Unburned wood dust and Fly-Ash.

5. MATERIAL OR PARAMETER BEING MONITORED AND RECORDED:

Up-Set Log - visible emissions that exceed 10% opacity for a specific period of time as listed in current permit are corrected in a timely matter.

6. METHOD OF MONITORING AND RECORDING:

Visible. Up-Sets are recorded in Log as they occur. If Up-Set continues beyond specified period of time Division of Air Pollution Control is notified.

7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):

One year after Title V permits are issued and once a year thereafter.

8. PAGE NUMBER: 22

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY OTHER METHOD(S)

1. FACILITY NAME:	Cortrim Hardwood Parts Company	
2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):	Stack #7, Diagram 1A	
3. EMISSION SOURCE (IDENTIFY):	Wood Waste Boilers #1 & #2 (82-0039-01)	
4. POLLUTANT(S) BEING MONITORED:	Unburned wood dust and Fly-Ash.	
5. DESCRIPTION OF THE METHOD OF MONITORING:	<p>State agency makes an unannounced inspection once a year to ensure visible emissions are at the levels listed in current permits (034930F). They also check Up-Set log to see if it is filled out properly.</p> <p>Operators (24 hr/day coverage) are required to watch stack continuously for any visible signs of smoke and/or soot out of stack, and to maintain stack temperature at about 400 degrees Farenheit. The operators are instructed to make adjustments immediately if emissions become visible, and to report all uncorrectable circumstances to management or maintenance.</p> <p>Repairs and recordings in Upset Log are then handled by maintenance.</p>	
6. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):	<p>One year after Title V permits are issued and once a year thereafter. Will contain last inspection report on hand.</p>	
7. PAGE NUMBER: 23	REVISION NUMBER: N/A	DATE OF REVISION: N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION - FUEL BURNING NON-PROCESS EQUIPMENT

1. FACILITY NAME: Cortrim Hardwood Parts Company				
2. LIST ALL FUEL-BURNING EQUIPMENT THAT IS AT THIS FUEL BURNING INSTALLATION. (PLEASE COMPLETE AN APC V.4 FORM FOR EACH PIECE OF FUEL BURNING EQUIPMENT). <div style="margin-left: 40px;"> -01 Wood Waste Boilers #1 & #2 (82-0039-01) -02 Scotch Marine Boiler (82-0039-02) </div>				
3. FUEL BURNING EQUIPMENT IDENTIFICATION NUMBER: -02			4. STACK ID OR FLOW DIAG. POINT ID(S): #8 Diagram 2A	
5. FUEL BURNING EQUIPMENT DESCRIPTION: Scotch Marine Boiler (82-0039-02) Standby package boiler which burns Natural Gas or #2 Oil if and when wood waste runs out for Wood Waste Boilers. Has a 200hp steam boiler with a Peabody Gordon-Piatt dual fired (natural gas & #2 oil) modulating burner. Maximum firing rate: Natural Gas -- 8400 CFPH and #2 Oil -- 60 GPH.				
6. DATE OF INSTALLATION OR LAST MODIFICATION OF FUEL BURNING EQUIPMENT: 01/05/85				
7. FURNACE TYPE: Dual fired modulating burner: Natural Gas & #2 Oil			8. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Superior Boiler National Board #6641	
9. MAXIMUM RATED HEAT INPUT CAPACITY (IN MILLION BTU/HOUR): 8.40			10. IF WOOD IS USED AS A FUEL, SPECIFY THE AMOUNT OF WOOD USED AS A FRACTION OF TOTAL HEAT INPUT. -9.00	
11. FUELS:				
PRIMARY FUEL	BACKUP FUEL #1	BACKUP FUEL #2	BACKUP FUEL #3	
FUEL NAME	Natural Gas	#2 Oil	N/A	N/A
ACTUAL YEARLY CONSUMPTION	15.965 MMF	17.500 MGL	N/A	N/A
Units are: FT3, GAL, TON or MMF(million ft3), MGL(thou. gal.), MTN(thou. tons)				
12. IF EMISSIONS FROM THIS FUEL BURNING EQUIPMENT ARE CONTROLLED FOR COMPLIANCE, PLEASE SPECIFY TYPE OF CONTROL: None. Exempt per 1200-3-9-.04(5)(g)9.				
13. IF EMISSIONS FROM THIS FUEL BURNING EQUIPMENT ARE MONITORED FOR COMPLIANCE, PLEASE SPECIFY TYPE MONITORING: N/A				
14. LOCATION OF THIS FUEL BURNING INSTALLATION IN UTM COORDINATES: UTM VERTICAL: 4048.80 UTM HORIZONTAL: 395.95				
15. NORMAL OPERATING SCHEDULE: 24 HRS/DAY 2 DAYS/WK 60 DAYS/YR * SEE ATTACHMENT FOR ITEM 15, OPERATING SCHEDULE				
16. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS, SUCH AS OUTDOOR STORAGE PILES, OPEN CONVEYORS, MATERIAL HANDLING OPERATIONS, etc. (PLEASE ATTACH A SEPARATE SHEET IF NECESSARY). Oil Tank Vent Boiler Blowdown				
17. PAGE NUMBER: 24 REVISION NUMBER: N/A DATE OF REVISION: N/A				

MAJOR SOURCE OPERATING PERMIT APPLICATION: FUEL BURNING NON-PROCESS EQUIPMENT
APC V.04

ATTACHMENT A
15. NORMAL OPERATING SCHEDULE (SPECIAL SCHEDULE).
SOURCE ID: -02

The normal operating schedule will vary according to the availability of wood waste for Wood Waste Boilers #1 & #2.

MAJOR SOURCE OPERATING PERMIT APPLICATION - MISCELLANEOUS PROCESSES

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. PROCESS ID NUMBER: -03	
3. STACK ID OR FLOW DIAGRAM PT ID(s): Diagram 3A (Stack Nos. 1 thru 6)			
IF EMISSIONS ARE CONTROLLED FOR COMPLIANCE, ATTACH THE APPROPRIATE AIR POLLUTION CONTROL SYSTEM FORM.			
4. NORMAL OPERATING SCHEDULE: 8 HRS/DAY 5.0 DAYS/WK 250 DAYS/YR		5. DATE OF CONSTRUCTION OR LAST MODIFICATION: 03/09/79	
6. DESCRIBE THIS PROCESS (PLEASE ATTACH A FLOW DIAGRAM OF THIS PROCESS) AND CHECK ONE OF THE FOLLOWING: BATCH <input checked="" type="checkbox"/> CONTINUOUS Wood working operation that takes rough kiln dried lumber and machines it into a large variety of parts for furniture and caskets.			
7. LIST THE TYPES AND AMOUNTS OF RAW MATERIALS INPUT TO THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE USAGE (AND UNITS)	MAXIMUM USAGE (AND UNITS)
Kiln dried hardwood/	Machined into parts.	3000.00 tons/year	4500.00 tons/year
Wood Glue	55 gal drums	3700.00 gallons	7000.00 gallons
8. LIST THE TYPES AND AMOUNTS OF PRIMARY PRODUCTS PRODUCED BY THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE AMOUNT PRODUCED (UNITS)	MAXIMUM AMOUNT PRODUCED(UNITS)
Wood Parts for furni	Warehouse/pallets	2000.00 tons/year	3000.00 tons/year
9. PROCESS FUEL USAGE:			
TYPE OF FUEL	MAX HEAT INPUT (MILLION BTU/HR)	AVERAGE USAGE (AND UNITS)	MAXIMUM USAGE (AND UNITS)
Wood Dust	15.82	1000.00 Tons/year	4500.00 N/A
10. LIST ANY SOLVENTS, CLEANERS, ETC., ASSOCIATED WITH THIS PROCESS: N/A			
IF THE EMISSIONS AND/OR OPERATIONS OF THIS PROCESS ARE MONITORED FOR COMPLIANCE, PLEASE ATTACH THE APPROPRIATE COMPLIANCE DEMONSTRATION FORM.			
11. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS, SUCH AS OUTDOOR STORAGE PILES, OPEN CONVEYORS, OPEN AIR SAND BLASTING, MATERIAL HANDLING OPRTATIONS ETC., (PLEASE ATTACH A SEPARATE SHEET IF NECESSARY). (PLEASE SEE ATTACHED PAGE)			
12. LOCATION OF THIS PROCESS EMISSION SOURCE IN UTM COORDINATES: UTM VERTICAL: 4048.80 UTM HORIZONTAL: 395.95			
13. PAGE NUMBER: 25 REVISION NUMBER: N/A DATE OF REVISION: N/A			

MAJOR SOURCE OPERATING PERMIT APPLICATION: MISCELLANEOUS PROCESSES
APC V.10

ATTACHMENT A

11. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS:
PROCESS ID: -03

Wood dust is controlled by a dust collection system.

Small leaks can appear in the dust collection system from time to time.

A closed bin is used at Plant II to collect the dust from Wood Working. Operation is brought to Plant I to be used as fuel in boilers. A small amount of dust escapes during transfer from transport vehicle.

Small amount of dust that does not ever enter system.

Occasional fire, upset, leak or blocked pipe in system causes small release of dust.

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - CYCLONES/SETTLING CHAMBERS

<p>1. FACILITY NAME: Cortrim Hardwood Parts Company</p>	<p>2. EMISSION SOURCE ID: 82-0039-03</p>																		
<p>3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Cyclone #3, Diagram 3A</p>																			
<p>4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). 12'6" Cyclone (82-0039-03) Centrifugal force separates wood dust from air and drops it into a closed dust collection bin for use as fuel in Wood Waste Boilers #1 & #2. Air is exhausted into atmosphere. Flow Rate: 27,800 ACFM Temperature: 68 Degrees Fahrenheit for figuring purposes (Ambient +/- 10 degrees Fahrenheit) Normal Operation: 8 to 9 hours/day, 250 days/yr Opacity: Visible Emissions not to exceed 15% opacity for not more than 5 minutes in any one hour or more than 20 minutes in any 24 hour period. Particulate matter: Not to exceed 0.02 grains/DSCF</p>																			
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">5. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.</th> <th style="width: 10%;">EFFICIENCY (%)</th> <th style="width: 40%;">SOURCE OF DATA</th> </tr> </thead> <tbody> <tr> <td>WOOD DUST AND SHAVINGS</td> <td>90.0</td> <td>Testing (1978)</td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		5. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.	EFFICIENCY (%)	SOURCE OF DATA	WOOD DUST AND SHAVINGS	90.0	Testing (1978)	N/A			N/A			N/A			N/A		
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WOOD DUST AND SHAVINGS	90.0	Testing (1978)																	
N/A																			
N/A																			
N/A																			
N/A																			
<p>6. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Collected wood dust and shavings is fed directly into a closed storage bin for use as fuel in wood waste boilers.</p>																			
<p>7. GAS FLOW RATE (ACFM): 27,800</p>																			
<p>8. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A</p>																			
<p>9. PAGE NUMBER: 26 REVISION NUMBER: N/A DATE OF REVISION: N/A</p>																			

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - CYCLONES/SETTLING CHAMBERS

<p>1. FACILITY NAME: Cortrim Hardwood Parts Company</p>	<p>2. EMISSION SOURCE ID: 82-0039-03</p>																		
<p>3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Cyclone #4, Diagram 3A</p>																			
<p>4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).</p> <p>20' Cyclone (82-0039-03) Centrifugal force separates wood dust from air and drops it into a closed dust collection bin for use in Wood Waste Boilers. Air is then sent into two Carter Day Fabric Filter Baghouses. Filtered air is then recirculated into plant.</p> <p>Flow Rate: 97,810 ACFM Temperature: 68 Degrees Fahrenheit (Ambient +/- 10 Degrees) Normal Operation: 8 - 9 hrs/day, 250 days/yr Opacity: Not to exceed 15% opacity for more than 5 min in any 1 hour or min in any 24 hour period Particulate matter: Not to exceed 0.02 grains/DSCF</p>																			
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5. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.	EFFICIENCY (%)	SOURCE OF DATA																	
WOOD DUST AND SHAVINGS	90.0	Testing (1978)																	
N/A																			
N/A																			
N/A																			
N/A																			
<p>6. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL.</p> <p>Collected wood dust is fed directly into a closed storage bin for use as a fuel in Wood Waste Boilers.</p>																			
<p>7. GAS FLOW RATE (ACFM): 82,000</p>																			
<p>8. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY.</p> <p>Full volume of air, plus remaining 10% of dust and shavings exiting top of cyclone is piped into 2 Carter Day Baghouses for further filtering. Overall efficiency near 99%.</p>																			
<p>9. PAGE NUMBER: 27 REVISION NUMBER: N/A DATE OF REVISION: N/A</p>																			

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - CYCLONES/SETTLING CHAMBERS

<p>1. FACILITY NAME: Cortrim Hardwood Parts Company</p>	<p>2. EMISSION SOURCE ID: 82-0039-03</p>																		
<p>3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Cyclone #5, Diagram 3A</p>																			
<p>4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). 13' Cyclone (82-0039-03) NOT IN USE, but available. Centrifugal force separates wood dust and shavings from air and drops it into a closed dust collection bin for use in Wood Waste Boilers. Air is then recirculated into atmosphere. Flow Rate: N/A NOT IN USE (When in use -- 29,920 ACFM) Temperature: 68 Degrees Fahrenheit (Ambient +/- 10 Degrees) Normal Operation: NONE [Emergency Bypass Unit]</p>																			
<p>5. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">POLLUTANT</th> <th style="width: 10%;">EFFICIENCY (%)</th> <th style="width: 40%;">SOURCE OF DATA</th> </tr> </thead> <tbody> <tr> <td>WOOD DUST AND SHAVINGS</td> <td>-9.0</td> <td>NOT IN USE</td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA	WOOD DUST AND SHAVINGS	-9.0	NOT IN USE	N/A			N/A			N/A			N/A		
POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA																	
WOOD DUST AND SHAVINGS	-9.0	NOT IN USE																	
N/A																			
N/A																			
N/A																			
N/A																			
<p>6. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Emergency Use Only. Collected wood dust is sent via blow pipe to a closed dust collection bin for use as fuel in Wood Waste Boilers.</p>																			
<p>7. GAS FLOW RATE (ACFM): -9</p>																			
<p>8. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A</p>																			
<p>9. PAGE NUMBER: 28 REVISION NUMBER: N/A DATE OF REVISION: N/A</p>																			

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. EMISSION SOURCE ID: 82-0039-03
3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Carter Day Baghouse #1, Diagram 3A		
4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Carter Day Baghouse #1, Plant I, (82-0039-03) (PLEASE SEE ATTACHMENT)		
5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Carter Day -- Model No. 144RJ84		6. DATE OF INSTALLATION: 1/01/74
7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.		
POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA
WOOD DUST	99.0	Air recirculated to plant in winter (Manufacturer)
N/A		
N/A		
N/A		
N/A		
8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Collected material is fed directly into wood storage bin to be used as fuel in wood waste boilers.		
9. IF THE BAGS ARE COATED, SPECIFY THE MATERIAL USED FOR COATING AND FREQUENCY OF COATING N/A		
10. DOES THE BAGHOUSE COLLECT ASBESTOS CONTAINING MATERIAL? YES ___ NO <u>X</u> IF "YES", PROVIDE DATA AS OUTLINED IN ITEM 10, INSTRUCTIONS FOR THIS FORM.		
11. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. Receives exhaust from 20' Cyclone (see page 27). 99% Efficient.		
12. PAGE NUMBER: 29 REVISION NUMBER: N/A DATE OF REVISION: N/A		

MAJOR SOURCE OPERATING PERMIT APPLICATION: CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS
APC V.18

ATTACHMENT A

4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).

Dust-laden air channeled from 20' Cyclone and is filtered thru fabric filters. Dust is collected in a closed dust storage bin to be used as fuel in a wood waste boiler. Clean Air is recirculated to plant in winter.

Flow Rate: 48,890 ACFM

Temperature: 68 Degrees Fahrenheit (Ambient +/- 10 degrees)

Normal Operation: 8 - 9 hours/day, 250 days/year

Opacity: Not to exceed 10% for not more than 5 minutes in any 1 hour or more than 20 minutes in any 24 hour period.

Particulate Matter: Not to exceed 0.1 lbs/hour

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. EMISSION SOURCE ID: 82-0039-03																		
3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Carter Day Baghouse #2, Diagram 3A																			
4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Carter Day Baghouse #2, Plant I (82-0039-03) (PLEASE SEE ATTACHMENT)																			
5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Carter Day -- Model No. 144RJ84	6. DATE OF INSTALLATION: 01/01/74																		
7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">POLLUTANT</th> <th style="width: 10%;">EFFICIENCY (%)</th> <th style="width: 40%;">SOURCE OF DATA</th> </tr> </thead> <tbody> <tr> <td>WOOD DUST</td> <td>99.0</td> <td>Air recirculated to plant in winter. (Manufacturer)</td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA	WOOD DUST	99.0	Air recirculated to plant in winter. (Manufacturer)	N/A			N/A			N/A			N/A		
POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA																	
WOOD DUST	99.0	Air recirculated to plant in winter. (Manufacturer)																	
N/A																			
N/A																			
N/A																			
N/A																			
8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Collected material is fed directly into closed wood storage bin to be used as fuel in wood waste boilers.																			
9. IF THE BAGS ARE COATED, SPECIFY THE MATERIAL USED FOR COATING AND FREQUENCY OF COATING N/A																			
10. DOES THE BAGHOUSE COLLECT ASBESTOS CONTAINING MATERIAL? YES ____ NO <u>X</u> IF "YES", PROVIDE DATA AS OUTLINED IN ITEM 10, INSTRUCTIONS FOR THIS FORM.																			
11. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. Receives exhaust from 20' cyclone (see page 27). 99% efficient.																			
12. PAGE NUMBER: 30 REVISION NUMBER: N/A DATE OF REVISION: N/A																			

MAJOR SOURCE OPERATING PERMIT APPLICATION: CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS
APC V.18

ATTACHMENT A

1. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).

Dust laden air channeled from a 20' Cyclone and filtered thru fabric filters. Dust is collected in a closed dust storage bin to be used as fuel in wood waste boilers. Clean air is recirculated to plant in winter.

Flow Rate: 48,890 ACFM

Temperature: 68 degrees fahrenheit (ambient +/- 10 degrees)

Normal Operation: 8 - 9 hours/day, 250 days/year

Opacity: Not to exceed 10% for no more than 5 minutes in any one hour or more than 20 minutes in any 24 hours

Particulate Matter: Not to exceed 0.1 lbs/hour

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. EMISSION SOURCE ID: 82-0039-03
3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Moldow #6, Diagram 3A		
4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Moldow Baghouse (82-0039-03) (PLEASE SEE ATTACHMENT)		
5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Moldow Dust Control, Inc.		6. DATE OF INSTALLATION: 8/01/78
7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.		
POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA
WOOD DUST AND SHAVINGS	99.0	Closed system in winter. (Manufacturer)
N/A		
N/A		
N/A		
N/A		
8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Wood dust is collected in a series of fabric filter bags and sent to a closed wood dust storage bin for use as fuel in wood waste boilers. Filtered air is recirculated into plant.		
9. IF THE BAGS ARE COATED, SPECIFY THE MATERIAL USED FOR COATING AND FREQUENCY OF COATING N/A		
10. DOES THE BAGHOUSE COLLECT ASBESTOS CONTAINING MATERIAL? YES ____ NO <u>X</u> IF "YES", PROVIDE DATA AS OUTLINED IN ITEM 10, INSTRUCTIONS FOR THIS FORM.		
11. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A		
12. PAGE NUMBER: 31 REVISION NUMBER: N/A DATE OF REVISION: N/A		

MAJOR SOURCE OPERATING PERMIT APPLICATION: CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS
APC V.18

ATTACHMENT A

4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).

Dust laden air passes thru fabric filter bags. Collected dust is sent to a closed dust storage for use in Wood Waste Boilers. Filtered air is recirculated back into plant in winter.

Flow Rate: 29,880 ACFM

Temperature: 68 Degrees Fahrenheit (Ambient +/- 10 degrees)

Opacity: Not to exceed 10% opacity for no more than 5 minutes in any 1 hour or more than 20 minutes in any 24 hour period.

Particulate Matter: 0.1 pounds/hour

Normal Operation: 8 to 9 hour/day, 250 days/year

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

ALL SOURCES THAT ARE SUBJECT TO 1200-3-9-.02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS ARE REQUIRED TO CERTIFY COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY INCLUDING A STATEMENT WITHIN THE PERMIT APPLICATION OF THE METHODS USED FOR DETERMINING COMPLIANCE. THIS STATEMENT MUST INCLUDE A DESCRIPTION OF THE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS. IN ADDITION, THE APPLICATION MUST INCLUDE A SCHEDULE FOR COMPLIANCE CERTIFICATION SUBMITTALS DURING THE PERMIT TERM. THESE SUBMITTALS MUST BE NO LESS FREQUENT THAN ANNUALLY AND MAY NEED TO BE MORE FREQUENT IF SPECIFIED BY THE UNDERLYING APPLICABLE REQUIREMENT OR THE TECHNICAL SECRETARY.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. PROCESS EMISSION SOURCE, FUEL BURNING INSTALLATION, OR INCINERATOR (IDENTIFY):
Wood Working Operations, Plant 1, (82-0039-03)

3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):
Stacks #1 thru #6, Diagram 3A

4. THIS SOURCE AS DESCRIBED UNDER ITEM #2 OF THIS APPLICATION WILL USE THE FOLLOWING METHOD(S) FOR DETERMINING COMPLIANCE WITH APPLICABLE REQUIREMENTS (AND SPECIAL OPERATING CONDITIONS FROM AN EXISTING PERMIT). CHECK ALL THAT APPLY AND ATTACH APPROPRIATE FORM(S).

- CONTINUOUS EMISSIONS MONITORING (CEM) - APC FORM V.20
POLLUTANT(S):
N/A
- EMISSION MONITORING USING PORTABLE MONITORS - APC FORM V.21
POLLUTANT(S):
N/A
- ☒ MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS
OF A PROCESS - APC FORM V.22
POLLUTANT(S):
Wood Dust
- ☒ MONITORING MAINTENANCE PROCEDURES - APC FORM V.23
POLLUTANT(S):
Wood Dust
- STACK TESTING - APC FORM V.24
POLLUTANT(S):
N/A
- FUEL SAMPLING & ANALYSIS (FSA) - APC FORM V.25
POLLUTANT(S):
N/A
- RECORDKEEPING - APC FORM V.26
POLLUTANT(S):
N/A
- OTHER (PLEASE DESCRIBE) - APC FORM V.27
POLLUTANT(S):
N/A

5. COMPLIANCE CERTIFICATION REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

6. COMPLIANCE MONITORING REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

7. PAGE NUMBER: 32 REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION - COMPLIANCE DEMONSTRATION BY
MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS

THE MONITORING OF A CONTROL SYSTEM PARAMETER OR A PROCESS PARAMETER SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PARAMETER VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. STACK ID OR FLOW DIAGRAM POINT ID(S): Stacks #1 thru #6, Diagram 3A
---	--

3. EMISSION SOURCE: Wood Working Operations, Plant I, (82-0039-03)

4. POLLUTANT(S) BEING MONITORED:
Wood Particulate

5. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE PARAMETER VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:

Visual inspections done by employees to determine if there is a problem.
State conducts yearly opacity inspections to determine if conditions listed on current permits (037802P) are being adhered to.

Parameters for visual inspection:

A. Baghouses: Not to exceed 10% opacity for 5 min/hour or 20 min in any 24 hour period.

B. Cyclones: Not to exceed 10% opacity for 5 min/hour or 20 min in any 24 hour period.

C. Particulate Matter for Baghouses: 0.1 lbs/hr

D. Particulate Matter for Cyclones: 0.02 grains/DSCF

E. Filtered Air returned to plant in winter. Even minor leaks would render workplace intolerable in a very short period of time.

6. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):

One year after receipt of Title V permits and once a year thereafter.

7. PAGE NUMBER: 33

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY MONITORING MAINTENANCE PROCEDURES

THE MONITORING OF A MAINTENANCE PROCEDURE SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME:	Cortrim Hardwood Parts Company	
2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATIONS(S):	Stacks #1 thru #6, Diagram 3A	
3. EMISSION SOURCE:	Wood Working Operations, Plant I, (82-0039-03)	
4. POLLUTANT(S) BEING MONITORED:	Wood Particulate	
5. PROCEDURE BEING MONITORED:	Regular inspections, cleaning and repair of filter bags and maintenance checks of equipment.	
6. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:	<p>Leaks are readily evident and when they occur and are immediately corrected. Filter bags in Baghouses are constantly monitored for leaks and are repaired as soon as a leak becomes evident. Once a year the filter bags in the Carter Day Baghouses are removed, inspected and damaged bags are replaced as needed. Maintaining regular inspections and repair of equipment. Upset log is kept for all malfunctions where it is known that particulate has escaped system in excess. Visual emissions would establish a need for maintenance due to excessive pollutants.</p>	
7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):	One year after receipt of Title V permits and once a year thereafter.	
8. PAGE NUMBER: 34	REVISION NUMBER: N/A	DATE OF REVISION: N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION - MISCELLANEOUS PROCESSES

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. PROCESS ID NUMBER: -06	
3. STACK ID OR FLOW DIAGRAM PT ID(s): Diagram 1B, Stack ID #9			
IF EMISSIONS ARE CONTROLLED FOR COMPLIANCE, ATTACH THE APPROPRIATE AIR POLLUTION CONTROL SYSTEM FORM.			
4. NORMAL OPERATING SCHEDULE: 8 HRS/DAY 5.0 DAYS/WK 260 DAYS/YR		5. DATE OF CONSTRUCTION OR LAST MODIFICATION: 04/01/86	
6. DESCRIBE THIS PROCESS (PLEASE ATTACH A FLOW DIAGRAM OF THIS PROCESS) AND CHECK ONE OF THE FOLLOWING: <div style="display: flex; justify-content: space-around; font-size: small;"> BATCH <input checked="" type="checkbox"/> CONTINUOUS </div> Dust collection system for a wood working operation. Wood dust is collected by a Carter Day Baghouse and transported to Plant I for burning.			
7. LIST THE TYPES AND AMOUNTS OF RAW MATERIALS INPUT TO THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE USAGE (AND UNITS)	MAXIMUM USAGE (AND UNITS)
	SEE ATTACHMENT		
8. LIST THE TYPES AND AMOUNTS OF PRIMARY PRODUCTS PRODUCED BY THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE AMOUNT PRODUCED (UNITS)	MAXIMUM AMOUNT PRODUCED(UNITS)
Caskets	Warehouse/Carts	12000.00 Units	20000.00 Units
9. PROCESS FUEL USAGE:			
TYPE OF FUEL	MAX HEAT INPUT (MILLION BTU/HR)	AVERAGE USAGE (AND UNITS)	MAXIMUM USAGE (AND UNITS)
N/A	-9.00	-9.00 N/A	-9.00 N/A
10. LIST ANY SOLVENTS, CLEANERS, ETC., ASSOCIATED WITH THIS PROCESS: Water - Solvent for Glue			
IF THE EMISSIONS AND/OR OPERATIONS OF THIS PROCESS ARE MONITORED FOR COMPLIANCE, PLEASE ATTACH THE APPROPRIATE COMPLIANCE DEMONSTRATION FORM.			
11. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS, SUCH AS OUTDOOR STORAGE PILES, OPEN CONVEYORS, OPEN AIR SAND BLASTING, MATERIAL HANDLING OPRTATIONS ETC., (PLEASE ATTACH A SEPARATE SHEET IF NECESSARY). (PLEASE SEE ATTACHED PAGE)			
12. LOCATION OF THIS PROCESS EMISSION SOURCE IN UTM COORDINATES: UTM VERTICAL: 4048.80 UTM HORIZONTAL: 395.95			
13. PAGE NUMBER: 35 REVISION NUMBER: N/A DATE OF REVISION: N/A			

MAJOR SOURCE OPERATING PERMIT APPLICATION: MISCELLANEOUS PROCESSES
APC V.10

ATTACHMENT A

7. LIST THE TYPES AND AMOUNTS OF RAW MATERIALS INPUT TO THIS PROCESS:
PROCESS ID: -06

7. LIST THE TYPES AND AMOUNTS OF RAW MATERIALS INPUT TO THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE USAGE (AND UNITS)	MAXIMUM USAGE (AND UNITS)
Kiln Dried Wood Part	Warehouse/pallets/buggies	44.00 tons/yr	75.00 tons/yr
Glue	Drums/pails	1100.00 gallons	2500.00 gallons
Particleboard	Pallets/stacks	55300.00 sq ft	114000.0 sq ft
Excelsior	Bales/Bin	790.00 bales	1900.00 bales
Fabrics	Bolts, hangers, shelves	42000.00 sq yds	92000.00 sq yds
Cotton	Bales, bags, bins	12000.00 lbs	22000.00 lbs

MAJOR SOURCE OPERATING PERMIT APPLICATION: MISCELLANEOUS PROCESSES
APC V.10

ATTACHMENT B

11. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS:
PROCESS ID: -06

Wood dust is collected in a closed storage bin and transported to Plant I to be used as fuel in Wood Waste Boilers. Small amount of dust may leak when storage bin is transported to Plant I. Occasionally dust misses a collection hood or a bag breaks -- dust is swept up and put back into system.

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. EMISSION SOURCE ID: 82-0039-06	
3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Carter Day Baghouse, Diagram 1B			
4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Carter Day Baghouse, Plant II (82-0039-06) (PLEASE SEE ATTACHMENT)			
5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Carter Day -- Model No. 144RJ84		6. DATE OF INSTALLATION: 01/01/76	
7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.			
POLLUTANT	EFFICIENCY (%)	SOURCE OF DATA	
WOOD DUST	99.9	Closed System	
N/A			
N/A			
N/A			
N/A			
8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Collected Material is fed directly into a closed storage bin and transported to Plant I to be used as a fuel in wood waste boilers.			
9. IF THE BAGS ARE COATED, SPECIFY THE MATERIAL USED FOR COATING AND FREQUENCY OF COATING N/A			
10. DOES THE BAGHOUSE COLLECT ASBESTOS CONTAINING MATERIAL? YES ____ NO <u>X</u> IF "YES", PROVIDE DATA AS OUTLINED IN ITEM 10, INSTRUCTIONS FOR THIS FORM.			
11. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A			
12. PAGE NUMBER: 36 REVISION NUMBER: N/A DATE OF REVISION: N/A			

MAJOR SOURCE OPERATING PERMIT APPLICATION: CONTROL EQUIPMENT - BAGHOUSES/FABRIC FILTERS
APC V.18

ATTACHMENT A

4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).

Dust laden air enters thru air inlet and dust is filtered thru of fabric filters. Dust is collected into a closed dust storage bin and transported to Plant I to be used as fuel in wood waste boilers. Clean air is recirculated to plant in winter.

Flow Rate: 31,970 ACFM

Temperature: 68 degrees Fahrenheit (Ambient +/- 10 degrees)

Normal Operation: 8 - 9 hours/day, 260 days/year

Opacity: Not to exceed 10% for more than 5 minutes/hour or 20 minutes every 24 hours.

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

ALL SOURCES THAT ARE SUBJECT TO 1200-3-9-02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS ARE REQUIRED TO CERTIFY COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY INCLUDING A STATEMENT WITHIN THE PERMIT APPLICATION OF THE METHODS USED FOR DETERMINING COMPLIANCE. THIS STATEMENT MUST INCLUDE A DESCRIPTION OF THE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS. IN ADDITION, THE APPLICATION MUST INCLUDE A SCHEDULE FOR COMPLIANCE CERTIFICATION SUBMITTALS DURING THE PERMIT TERM. THESE SUBMITTALS MUST BE NO LESS FREQUENT THAN ANNUALLY AND MAY NEED TO BE MORE FREQUENT IF SPECIFIED BY THE UNDERLYING APPLICABLE REQUIREMENT OR THE TECHNICAL SECRETARY.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. PROCESS EMISSION SOURCE, FUEL BURNING INSTALLATION, OR INCINERATOR (IDENTIFY):
Wood Working Operations, Plant II, (82-0039-06)

3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):
Stack #9, Diagram 1B

4. THIS SOURCE AS DESCRIBED UNDER ITEM #2 OF THIS APPLICATION WILL USE THE FOLLOWING METHOD(S) FOR DETERMINING COMPLIANCE WITH APPLICABLE REQUIREMENTS (AND SPECIAL OPERATING CONDITIONS FROM AN EXISTING PERMIT). CHECK ALL THAT APPLY AND ATTACH APPROPRIATE FORM(S).

- CONTINUOUS EMISSIONS MONITORING (CEM) - APC FORM V.20
POLLUTANT(S):
N/A
- EMISSION MONITORING USING PORTABLE MONITORS - APC FORM V.21
POLLUTANT(S):
N/A
- X- MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS
OF A PROCESS - APC FORM V.22
POLLUTANT(S):
Wood Dust
- X- MONITORING MAINTENANCE PROCEDURES - APC FORM V.23
POLLUTANT(S):
Wood Dust
- STACK TESTING - APC FORM V.24
POLLUTANT(S):
N/A
- FUEL SAMPLING & ANALYSIS (FSA) - APC FORM V.25
POLLUTANT(S):
N/A
- RECORDKEEPING - APC FORM V.26
POLLUTANT(S):
N/A
- OTHER (PLEASE DESCRIBE) - APC FORM V.27
POLLUTANT(S):
N/A

5. COMPLIANCE CERTIFICATION REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

6. COMPLIANCE MONITORING REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

7. PAGE NUMBER: 37 REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION - COMPLIANCE DEMONSTRATION BY
MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS

THE MONITORING OF A CONTROL SYSTEM PARAMETER OR A PROCESS PARAMETER SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PARAMETER VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME:

Cortrim Hardwood Parts Company

2. STACK ID OR FLOW
DIAGRAM POINT ID(S):
Stack #9, Diagram 1B

3. EMISSION SOURCE:

Wood Working Operations, Plant II, (82-0039-06)

4. POLLUTANT(S) BEING MONITORED:

Wood Particulate

5. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE
PARAMETER VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:

Visual inspections are done regularly to determine if conditions of current permit (037803P) are being followed. State also conducts yearly, unannounced inspections. Filtered air is returned to plant in winter and even minor leaks would render workplace intolerable in a very short period of time.

Opacity: Not to exceed 10% for more than 5 min/hour or 20 minutes per every 24 hours.

6. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE
WILL BE DEMONSTRATED):

One year after receipt of Title V permits, then once a year thereafter.

7. PAGE NUMBER: 38

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY MONITORING MAINTENANCE PROCEDURES

THE MONITORING OF A MAINTENANCE PROCEDURE SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME:	Cortrim Hardwood Parts Company	
2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATIONS(S):	Stack #9, Diagram 1B	
3. EMISSION SOURCE:	Wood Working Operations, Plant II, (82-0039-06)	
4. POLLUTANT(S) BEING MONITORED:	Wood Dust	
5. PROCEDURE BEING MONITORED:	Regular maintenance on dust collection system and Carter Day.	
6. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:	<p>Regular inspection of collection system and baghouse to determine if bags are damaged and if repairs are needed. Old bags are replaced as necessary. System is kept in clean and good working order to keep efficiency at peak performance. Mechanical inspection performed once per year. Upset log is kept for all malfunctions which result in excessive discharge.</p>	
7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):	One year after receipt of Title V permits and once a year thereafter.	
8. PAGE NUMBER: 39	REVISION NUMBER: N/A	DATE OF REVISION: N/A

APC V.9

1. FACILITY NAME: Cortrim Hardwood Parts Company				2. PROCESS ID CODE: -07 AND DESCRIPTION: Spray Room Activities: Six Spray Booths with air guns, fill stations and stain stations applying stains, fills, and lacquers to finished caskets.									
3. DATE OF CONSTRUCTION OR LAST MODIFICATION: 02/01/95				4. STACK ID OR FLOW DIAG. POINT ID(S): Diagram 2B, Stack ID's #10 thru #15									
IF THE EMISSIONS ARE CONTROLLED FOR COMPLIANCE, ATTACH AN APPROPRIATE AIR POLLUTION CONTROL SYSTEM FORM. IF THIS PRINTING OPERATION IS MONITORED FOR COMPLIANCE, PLEASE ATTACH THE APPROPRIATE COMPLIANCE DEMONSTRATION FORM.													
5. NORMAL OPERATING SCHEDULE:				8 HRS/DAY		5 DAYS/WK		260 DAYS/YR					
6. OVEN CURING (COMPLETE IF APPLICABLE): NUMBER OF OVENS: 1 SPECIFY OVEN FUELS: Natural Gas				TEMP. OF AIR CONTACTING COATED MATERIAL AS IT LEAVES THE OVEN (°F): 140 TOTAL MAXIMUM HEAT INPUT TO EACH OVEN: 2.0 Million Btu/Hr									
7. APPLICATION TECHNIQUE AND TRANSFER EFF. (%): Air driven spray guns -- 40%													
8. COMPLETE THE FOLLOWING TABLE - ATTACH ADDITIONAL TABLES AS NEEDED - FILL IN ONLY THE ITEMS NECESSARY FOR DETERMINATION OF COMPLIANCE WITH EMISSION STANDARD(S).													
IDENTIFY COATINGS:	MAXIMUM USAGE:		NORMAL USAGE GAL/MO	COATING COMP. WEIGHT % AS APPLIED								DENSITY OF SOLVENT FRACTION LBS/GAL	COATING DENSITY LBS/GAL
	GAL/DAY	GAL/MO		SOLIDS		SOLVTS (VOCs)		WATER		EXEMPT SOLVENTS			
Lacquers	93	2895	385	21.0	28.0	73.0	N/A	N/A	N/A	N/A	7.1	7.8	
Wiping Stain	16	500	92	5.0	7.0	81.0	1.0	N/A	18.0	N/A	6.5	7.5	
Color Coats/Shades	7	213	25	19.0	25.0	75.0	N/A	N/A	N/A	N/A	6.6	7.9	
TOTAL PAINTS	-9	-9	-9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
LIST THE THINNING SOLVENTS USED WITH THE COATINGS IDENTIFIED ABOVE:													
Thinning Thinner	13	400	49	N/A	N/A	100.0	N/A	N/A	N/A	N/A	6.8	6.8	
Naphtha/Mineral Spirits	10	300	28	N/A	N/A	100.0	N/A	N/A	N/A	N/A	6.5	6.5	
LEAN-UP SOLVENTS: Wash-Off Thinners	12	350	55	N/A	N/A	100.0	N/A	N/A	N/A	N/A	6.7	6.7	
OTHER (Specify): PLEASE SEE ATTACHMENT													
9. LOCATION OF THIS OPERATION IN UTM COORDINATES: (KILOMETERS) UTM VERTICAL: 4048.80 UTM HORIZONTAL: 395.95													
0. PAGE NUMBER: 40				REVISION NUMBER: N/A				DATE OF REVISION: N/A					

MAJOR SOURCE OPERATING PERMIT APPLICATION: PAINTING AND COATING OPERATIONS
 APC V.09
 ATTACHMENT A "OTHER" SOLVENTS

8. COMPLETE THE FOLLOWING TABLE - ATTACH ADDITIONAL TABLES AS NEEDED - FILL IN ONLY THE ITEMS NECESSARY FOR DETERMINATION OF COMPLIANCE WITH EMISSION STANDARD(S).

OF COMPLIANCE WITH EMISSION STANDARD(S):													
IDENTIFY COATINGS:	MAXIMUM USAGE:		NORMAL USAGE	COATING COMP. WEIGHT % AS APPLIED								DENSITY OF SOLVENT FRACTION	COATING DENSITY
				SOLIDS		SOLVTS (VOCs)		WATER		EXEMPT SOLVENTS			
	GAL/HR	GAL/MO	GAL/MO	VOL %	WT %	WT %	VOL %	WT %	VOL %	WT %	LBS/GAL	LBS/GAL	
Fillers	7	200	26	31.0	56.0	43.0	1.0	N/A	2.0	N/A	6.4	10.2	
Lacquer Sealers	25	750	345	16.0	22.0	78.0	N/A	N/A	N/A	N/A	7.0	7.5	
Booth Coating	3	100	34	N/A	47.0	53.0	N/A	N/A	N/A	N/A	4.0	7.5	

MAJOR SOURCE OPERATING PERMIT APPLICATION
CONTROL EQUIPMENT - MISCELLANEOUS

<p>1. FACILITY NAME: Cortrim Hardwood Parts Company</p>	<p>2. EMISSION SOURCE ID: 82-0039-07 (Six Spray Booths)</p>																		
<p>3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S): Diagram 2B, Stacks #10 thru #15</p>																			
<p>4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE). Six Spray Booths (82-0039-07) (PLEASE SEE ATTACHMENT)</p>																			
<p>5. MANUFACTURER AND MODEL NUMBER (IF AVAILABLE): Air Filter Systems, Inc., Protectaire, DeVilbliss</p>																			
<p>6. DATE OF INSTALLATION: 1/01/84</p>																			
<p>7. LIST OF POLLUTANT(S) TO BE CONTROLLED BY THIS EQUIPMENT AND THE EXPECTED CONTROL EFFICIENCY FOR EACH POLLUTANT.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">POLLUTANT</th> <th style="width: 10%;">EFFIC (%)</th> <th style="width: 40%;">SOURCE OF DATA</th> </tr> </thead> <tbody> <tr> <td>FINISHING SOLIDS</td> <td>90.0</td> <td>Sales Data.</td> </tr> <tr> <td>FINISHING SOLVENTS</td> <td>-9.0</td> <td>Sales Data.</td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		POLLUTANT	EFFIC (%)	SOURCE OF DATA	FINISHING SOLIDS	90.0	Sales Data.	FINISHING SOLVENTS	-9.0	Sales Data.	N/A			N/A			N/A		
POLLUTANT	EFFIC (%)	SOURCE OF DATA																	
FINISHING SOLIDS	90.0	Sales Data.																	
FINISHING SOLVENTS	-9.0	Sales Data.																	
N/A																			
N/A																			
N/A																			
<p>8. DISCUSS HOW COLLECTED MATERIAL IS HANDLED FOR REUSE OR DISPOSAL. Once a week the filters are cleaned or replaced. Booth coating is applied as needed. When the filters become loaded between changes, they are shaken clean, collected material is swept up and disposed of into a "special waste" container. Old filters are disposed of in a "special waste" container to be removed to landfill.</p>																			
<p>9. IF THIS CONTROL EQUIPMENT IS IN SERIES WITH SOME OTHER CONTROL EQUIPMENT, STATE AND SPECIFY THE OVERALL EFFICIENCY. N/A</p>																			
<p>13. PAGE NUMBER: 41 REVISION NUMBER: N/A DATE OF REVISION: N/A</p>																			

MAJOR SOURCE OPERATING PERMIT APPLICATION: CONTROL EQUIPMENT - MISCELLANEOUS
APC V.11

ATTACHMENT A

4. DESCRIBE THE DEVICE IN USE. LIST THE KEY OPERATING PARAMETERS OF THIS DEVICE AND THEIR NORMAL OPERATING RANGE (e.g. PRESSURE DROP, GAS FLOW RATE, TEMPERATURE).

Paper filters for Six Spray Booths -- Are changed regularly.
Efficiency rating: 90% Holding Capacity: 1.20-1.5 lbs @ 0.5" W.C.
Size: 20" x 20" x 6ply (Same size for all six booths, however number of pads per booth will vary depending on size of booth.
Temperature: 68 degrees Fahrenheit (Ambient +/- 10 Degrees)
Usage Log is kept.
VOC's: Not to exceed 207.1 tons/year
Particulate Matter: Not to exceed 0.02 grains/DSCF
Opacity: Not to exceed 20% per 6 minute average
Materials Not to exceed:
Lacquers -- 2,895 gal/mo Wiping Stain -- 500 gal/mo
Washoff Thinner -- 350 gal/mo Color Coat -- 213 gal/mo
Mixing Thinner -- 400 gal/mo Lacquer Sealer -- 750 gal/mo
Naphtha (Mineral Sp) -- 300 gal/mo Booth Coating -- 100 gal/mo
Gas Flow: 25,000 DSCFM average; 42,000 DSCFM maximum (all booths).

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

ALL SOURCES THAT ARE SUBJECT TO 1200-3-9-.02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS ARE REQUIRED TO CERTIFY COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY INCLUDING A STATEMENT WITHIN THE PERMIT APPLICATION OF THE METHODS USED FOR DETERMINING COMPLIANCE. THIS STATEMENT MUST INCLUDE A DESCRIPTION OF THE MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS. IN ADDITION, THE APPLICATION MUST INCLUDE A SCHEDULE FOR COMPLIANCE CERTIFICATION SUBMITTALS DURING THE PERMIT TERM. THESE SUBMITTALS MUST BE NO LESS FREQUENT THAN ANNUALLY AND MAY NEED TO BE MORE FREQUENT IF SPECIFIED BY THE UNDERLYING APPLICABLE REQUIREMENT OR THE TECHNICAL SECRETARY.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. PROCESS EMISSION SOURCE, FUEL BURNING INSTALLATION, OR INCINERATOR (IDENTIFY):
Six Spray Booths (82-0039-07)

3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):
Stacks #10 thru #15, Diagram 2B

4. THIS SOURCE AS DESCRIBED UNDER ITEM #2 OF THIS APPLICATION WILL USE THE FOLLOWING METHOD(S) FOR DETERMINING COMPLIANCE WITH APPLICABLE REQUIREMENTS (AND SPECIAL OPERATING CONDITIONS FROM AN EXISTING PERMIT). CHECK ALL THAT APPLY AND ATTACH APPROPRIATE FORM(S).

— CONTINUOUS EMISSIONS MONITORING (CEM) - APC FORM V.20
POLLUTANT(S):
N/A

— EMISSION MONITORING USING PORTABLE MONITORS - APC FORM V.21
POLLUTANT(S):
N/A

☒ MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS
OF A PROCESS - APC FORM V.22
POLLUTANT(S):
Finishing Solids (particulate)

☒ MONITORING MAINTENANCE PROCEDURES - APC FORM V.23
POLLUTANT(S):
Finishing Solids (particulate)

— STACK TESTING - APC FORM V.24
POLLUTANT(S):
N/A

— FUEL SAMPLING & ANALYSIS (FSA) - APC FORM V.25
POLLUTANT(S):
N/A

☒ RECORDKEEPING - APC FORM V.26
POLLUTANT(S):
VOC's and Hazardous ingredients

— OTHER (PLEASE DESCRIBE) - APC FORM V.27
POLLUTANT(S):
N/A

5. COMPLIANCE CERTIFICATION REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year.

6. COMPLIANCE MONITORING REPORTS WILL BE SUBMITTED TO THE DIVISION ACCORDING TO THE FOLLOWING SCHEDULE.

START DATE: One year after receipt of Title V permits.

AND EVERY 365 DAYS THEREAFTER. One each year

7. PAGE NUMBER: 42

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION - COMPLIANCE DEMONSTRATION BY
MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS

THE MONITORING OF A CONTROL SYSTEM PARAMETER OR A PROCESS PARAMETER SHALL BE ACCEPTABLE
AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PARAMETER
VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. STACK ID OR FLOW DIAGRAM POINT ID(S): Stacks 10 thru 15 Diagram 2B
---	--

3. EMISSION SOURCE: Six Spray Booths, (82-0039-07)

4. POLLUTANT(S) BEING MONITORED:
Finishing Solids (Particulate)

5. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE
PARAMETER VALUE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:

Weekly spot check of booth conditions. Weekly Check Log is kept.

Particulate emissions are contingent upon quantity of material used and filter efficiency. Filter efficiency is dependent on condition, placement, coverage and load. Routine inspection of booth conditions insures favorable condition of filters and exhaust units, as well as safe working conditions.

6. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE
WILL BE DEMONSTRATED):

One year after receipt of Title V permits and then once a year thereafter.

7. PAGE NUMBER: 43

REVISION NUMBER: N/A

DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY MONITORING MAINTENANCE PROCEDURES

THE MONITORING OF A MAINTENANCE PROCEDURE SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT IS ESTABLISHED.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATIONS(S):
Stacks #10 thru #15, Diagram 2B

3. EMISSION SOURCE: Six Spray Booths (82-0039-07)

4. POLLUTANT(S) BEING MONITORED:
Overspray and finish material dust.

5. PROCEDURE BEING MONITORED:
Maintenance and regular cleaning of spray equipment and six spray booths.

6. DESCRIPTION OF THE METHOD OF MONITORING AND ESTABLISHMENT OF CORRELATION BETWEEN THE PROCEDURE AND THE EMISSION RATE OF A PARTICULAR POLLUTANT:

Regular maintenance cleaning of spray guns and equipment keeps spraying efficiency to acceptable levels and reduces amount of overspray. Spray Booths are cleaned weekly and filters are replaced to prevent particulate matter from escaping up thru stacks. Entire spraying room is cleaned weekly to keep overspray dust to a minimum.

7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):

One year after receipt of Title V permits and once a year thereafter.

8. PAGE NUMBER: 44 REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
COMPLIANCE DEMONSTRATION BY RECORDKEEPING

RECORDKEEPING SHALL BE ACCEPTABLE AS A COMPLIANCE DEMONSTRATION METHOD PROVIDED THAT A CORRELATION BETWEEN THE PARAMETER VALUE RECORDED AND THE APPLICABLE REQUIREMENT IS ESTABLISHED.

1. FACILITY NAME: Cortrim Hardwood Parts Company

2. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION(S):
Stack #10 thru #15, Diagram 2B

3. EMISSION SOURCE (IDENTIFY):
Six Spray Booths (82-0039-07)

4. POLLUTANT(S) OR PARAMETER BEING MONITORED:
VOC's and Hazardous ingredients of finish material used in spray room.

5. MATERIAL OR PARAMETER BEING MONITORED AND RECORDED:
Spray finishes and lacquers, thinners, stains, and fillers used in spray room.

6. METHOD OF MONITORING AND RECORDING:

A monthly log is kept in spraying department of the finish materials that are used. Using MSDS's for each product the amount of VOC's and hazardous ingredients for each is determined and recorded. A comparison to current permits is done to assure that permits limits are not being exceeded. Once a year SARA Title III is filed as required.

7. COMPLIANCE DEMONSTRATION FREQUENCY (SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED):

One year after receipt of Title V permits and once a year thereafter.

8. PAGE NUMBER: 45 REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. STACK ID OR FLOW DIAGRAM POINT ID(S) Diagram 1A (Fugitive emissions are part of totals)		
3. PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION OR INCINERATOR (IDENTIFY): Wood Waste Boilers #1 & #2 (82-0039-01)				
4. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS: FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.				
AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
PARTICULATES (TSP)	202.6		25.360	
(FUGITIVE)	N/A		N/A	
SULFUR DIOXIDE	2.190		0.6132000	
(FUGITIVE)	N/A		N/A	
VOLATILE ORGANIC	N/A		6.132	
(FUGITIVE)	N/A		N/A	
CARBON MONOXIDE	N/A		17.082	
(FUGITIVE)	N/A		N/A	
NITROGEN OXIDES	N/A		4.161	
(FUGITIVE)	N/A		N/A	
LEAD	N/A		N/A	
(FUGITIVE)	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
(FUGITIVE)	N/A		N/A	
MERCURY	N/A		N/A	
(FUGITIVE)	N/A		N/A	
ASBESTOS	N/A		N/A	
(FUGITIVE)	N/A		N/A	
BERYLLIUM	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

(CONTINUED ON NEXT PAGE)

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
GASEOUS FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT & CAS	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
N/A N/A	N/A		N/A	

8. PAGE NUMBER: 46 (Part B) REVISION NUMBER: N/A DATE OF REVISION: N/A

Calculations:
Using Potential to emit (8760 hrs/yr)
PC Form V.28

Wood Waste Boilers #1 & #2 (82-0039-01)

Particulates:

Actuals (From 1992 Assessment Calculations -- 5.79 lbs/hr)

$$5.79 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = \mathbf{25.3602 \text{ tons/yr}}$$

Allowables

Listed on Permit: 0.55 grain/DSCF

Flow Rate at Standard conditions: 9810 DSCFM

Conversion

$$\begin{aligned} 0.55 \text{ grains/DSCF} \times 1 \text{ lb}/7000 \text{ grains} &= 0.0000786 \text{ lbs/DSCF} \\ 0.0000786 \text{ lbs/DSCF} \times 9810 \text{ DSCFM} &= 0.771066 \text{ lbs/min} \\ 0.771066 \text{ lbs/min} \times 60 \text{ min/hr} \times 8760 \text{ hrs/yr} &= 405,272.2896 \text{ lbs/yr} \\ 405,272.2896 \text{ lbs/yr} \times 1 \text{ ton}/2000 \text{ lbs} &= \mathbf{202.6361448 \text{ tons/yr}} \end{aligned}$$

Sulphur Dioxide (SO₂)

Actuals (From 1992 Assessment Calculations -- 0.14 lbs/hr)

$$0.14 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = \mathbf{0.6132 \text{ tons/yr}}$$

Allowables

Listed on Permit: 0.5 lbs/hr

Conversion

$$0.5 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = \mathbf{2.19 \text{ tons/yr}}$$

Nitrous Oxides (No_x)

Actuals (From 1992 Assessment Calculations -- 0.95 lbs/hr)

$$0.95 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{4.161 \text{ tons/yr}}$$

Allowables

None listed on permit.

Carbon Monoxide (CO)

Actual (From 1992 Assessment Calculations -- 3.9 lbs/hr)

$$3.9 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{17.082 \text{ tons/yr}}$$

Allowables

None listed on permit.

Volatile Organic Compounds (VOC's)

Actual (From 1992 Assessment Calculations -- Nonmethane VOC's -- 1.40 lbs/hr)

$$1.40 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{6.132 \text{ tons/yr}}$$

Allowables

None listed on permit.

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. STACK ID OR FLOW DIAGRAM POINT ID(S) Diagram 3A (Fugitive emissions are part of totals.)			
3. PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION OR INCINERATOR (IDENTIFY): Wood Working Operations, Plant I (82-0039-03)				
4. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS: FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.				
AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
PARTICULATES (TSP)	108.3		19.534	
(FUGITIVE)	N/A		N/A	
SULFUR DIOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VOLATILE ORGANIC	N/A		N/A	
(FUGITIVE)	N/A		N/A	
CARBON MONOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
NITROGEN OXIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	
LEAD	N/A		N/A	
(FUGITIVE)	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
(FUGITIVE)	N/A		N/A	
MERCURY	N/A		N/A	
(FUGITIVE)	N/A		N/A	
ASBESTOS	N/A		N/A	
(FUGITIVE)	N/A		N/A	
BERYLLIUM	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	
(CONTINUED ON NEXT PAGE)				

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
GASEOUS FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT & CAS	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
N/A N/A	N/A		N/A	

8. PAGE NUMBER: 47

(Part B)

REVISION NUMBER: N/A

DATE OF REVISION: N/A

**Calculations:
Using Potential to emit (8760 hrs/yr)
APC Form V.28**

Wood Working Operations, Plant I (82-0039-03)

Particulates

Actual Listed as Negligible on 1992 Assessment
(From 1977 State Tests:

20' Cyclone -- 0.0 lbs/hr

13' Cyclone -- 0.0 lbs/hr

Carter Day Baghouse #1 -- 0.0 lbs/hr

Carter Day Baghouse #2 -- 0.0 lbs/hr

Moldow Baghouse -- 0.0 lbs/hr

12'6" Cyclone -- 4.46 lbs/hr)

$0.0 \text{ lbs/hr} + 0.0 \text{ lbs/hr} + 0.0 \text{ lbs/hr} + 0.0 \text{ lbs/hr} + 0.0 \text{ lbs/hr} + 4.46 \text{ lbs/hr} = 4.46 \text{ lbs/hr}$
 $4.46 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 19.5341 \text{ tons/yr}$

Allowable (includes fugitive emission amounts)

Listed on permit:

0.02 grains/DSCF for 20' Cyclone

0.02 grains/DSCF for 13' Cyclone

0.1 lbs/hr for Carter Day Baghouse #1

0.1 lbs/hr for Carter Day Baghouse #2

0.1 lbs/hr for Moldow Baghouse

4.77 lbs/hr for 12'6" Cyclone

Conversion

20' Cyclone: Flow Rate -- 88,391.05 DSCFM

$0.02 \text{ grains/DSCF} \times 88,391.05 \text{ DSCFM} \times 60 \text{ min/hr} \times 1 \text{ lb}/7000 \text{ grains}$
 $\times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 66.36905126 \text{ tons/yr}$

13' Cyclone: Flow Rate -- 27,042.76 DSCFM

$0.02 \text{ grain/DSCF} \times 27,042.76 \text{ DSCFM} \times 60 \text{ min/hr} \times 1 \text{ lb}/7000 \text{ grains} \times 8760$
 $\text{hr/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 20.30524951 \text{ tons/yr}$

Carter Day Baghouse #1

$0.1 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 0.438 \text{ tons/yr}$

Carter Day Baghouse #2

$0.1 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 0.438 \text{ tons/yr}$

Moldow Baghouse

$0.1 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 0.438 \text{ tons/yr}$

12'6" Cyclone

$4.77 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 20.8926 \text{ tons/yr}$

Total Amount Allowed

$66.36905126 \text{ tons/yr} + 20.30524951 \text{ tons/yr} + 0.438 \text{ tons/yr} + 0.438 \text{ tons/yr} + 0.438$
 $\text{tons/yr} + 20.30524951 \text{ tons/yr} = 108.2935503 \text{ tons/yr}$

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. STACK ID OR FLOW DIAGRAM POINT ID(S) Diagram 2A (Fugitive emissions are part of totals)			
3. PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION OR INCINERATOR (IDENTIFY): Scotch Marine Boiler (82-0039-02)				
4. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS: FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.				
AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
PARTICULATES (TSP)	22.075		0.5256000	
(FUGITIVE)	N/A		N/A	
SULFUR DIOXIDE	88.301		11.195	
(FUGITIVE)	N/A		N/A	
VOLATILE ORGANIC	N/A		0.0893520	
(FUGITIVE)	N/A		N/A	
CARBON MONOXIDE	N/A		1.314	
(FUGITIVE)	N/A		N/A	
NITROGEN OXIDES	N/A		5.256	
(FUGITIVE)	N/A		N/A	
LEAD	N/A		N/A	
(FUGITIVE)	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
(FUGITIVE)	N/A		N/A	
MERCURY	N/A		N/A	
(FUGITIVE)	N/A		N/A	
ASBESTOS	N/A		N/A	
(FUGITIVE)	N/A		N/A	
BERYLLIUM	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

(CONTINUED ON NEXT PAGE)

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
GASEOUS FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT & CAS	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
N/A N/A	N/A		N/A	

8. PAGE NUMBER: 48 (Part B) REVISION NUMBER: N/A DATE OF REVISION: N/A

Calculations:
Using Potential to emit (8760 hrs/yr)
APC Form V.28

Scotch Marine Boiler - Natural Gas & #2 Oil (82-0039-02)

Particulates

Actual (From 1992 Assessment Calculations -- 0.12 lbs/hr)

$$0.12 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{0.5256 \text{ tons/yr}}$$

Allowables

Listed on permit: 0.600 lb/MM BTU
Maximum Input Capacity -- 8.4 MM BTU/hr

$$0.600 \text{ lb/MM BTU} \times 8.4 \text{ MM BTU/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{22.0752 \text{ ton/yr}}$$

Sulphur Dioxide (SO₂)

Actual (From 1992 Assessment Calculations -- 2.556 lbs/hr)

$$2.556 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{11.19528 \text{ tons/yr}}$$

Allowables

Listed on permit: 2.4 lb/MM BTU
Maximum Input Capacity -- 8.4 MM BTU/hr

$$2.4 \text{ lb/MM BTU} \times 8.4 \text{ MM BTU/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{88.3008 \text{ ton/yr}}$$

Nitrous Oxides (No_x)

Actual (From 1992 Assessment Calculations -- 1.2 lbs/hr)

$$1.2 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{5.256 \text{ tons/yr}}$$

Allowables

None listed on permit.

Carbon Monoxide (CO)

Actual (From 1992 Assessment Calculations -- 0.3 lbs/hr)

$$0.3 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{1.314 \text{ tons/yr}}$$

Allowables

None listed on permit.

Volatile Organic Compounds (VOC's)

Actual (From 1992 Assessment Calculations -- 0.0204 lbs/hr)

$$0.0204 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = \mathbf{0.089352 \text{ tons/yr}}$$

Allowables

None listed on permit.

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR

1. FACILITY NAME: Cortrim Hardwood Parts Company	2. STACK ID OR FLOW DIAGRAM POINT ID(S) Diagram 1B (Fugitive emissions are part of totals.)			
3. PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION OR INCINERATOR (IDENTIFY): Wood Working Operations, Plant II (82-0039-06)				
4. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS: FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.				
AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
PARTICULATES (TSP)	N/A		N/A	
(FUGITIVE)	N/A		N/A	
SULFUR DIOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VOLATILE ORGANIC	N/A		N/A	
(FUGITIVE)	N/A		N/A	
CARBON MONOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
NITROGEN OXIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	
LEAD	N/A		N/A	
(FUGITIVE)	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
(FUGITIVE)	N/A		N/A	
MERCURY	N/A		N/A	
(FUGITIVE)	N/A		N/A	
ASBESTOS	N/A		N/A	
(FUGITIVE)	N/A		N/A	
BERYLLIUM	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

(CONTINUED ON NEXT PAGE)

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
GASEOUS FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT & CAS	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
N/A N/A	N/A		N/A	

8. PAGE NUMBER: 49 (Part B) REVISION NUMBER: N/A DATE OF REVISION: N/A

Calculations:

Using Potential to emit (8760 hrs/yr)

APC Form V.28

Wood Working Operations, Plant II (82-0039-06)

Particulates

Actual (From State Testing 1978)

Listed as negligible -- 0.0 lbs/hr

Allowables (includes fugitive emission amounts)

Permit does not list any allowable amounts, only opacity.

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR

1. FACILITY NAME: Cortrim Hardwood Parts Company
2. STACK ID OR FLOW DIAGRAM POINT ID(S): Diagram 2B (Fugitive emissions are part of totals.)

3. PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION OR INCINERATOR (IDENTIFY):
Six Spray Booths (82-0039-07)

4. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS: FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
PARTICULATES (TSP)	32.621		1.097	
(FUGITIVE)	N/A		N/A	
SULFUR DIOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VOLATILE ORGANIC	207.1		42.144	
(FUGITIVE)	N/A		N/A	
CARBON MONOXIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
NITROGEN OXIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	
LEAD	N/A		N/A	
(FUGITIVE)	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
(FUGITIVE)	N/A		N/A	
MERCURY	N/A		N/A	
(FUGITIVE)	N/A		N/A	
ASBESTOS	N/A		N/A	
(FUGITIVE)	N/A		N/A	
BERYLLIUM	N/A		N/A	
(FUGITIVE)	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
(FUGITIVE)	N/A		N/A	
FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

(CONTINUED ON NEXT PAGE)

AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
GASEOUS FLUORIDES	N/A		N/A	
(FUGITIVE)	N/A		N/A	

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.

AIR POLLUTANT & CAS	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
METHANOL* 67561	N/A		1.413	
METHYL ETHYL KETONE* 78933	N/A		2.971	
NAPHTHALENE* 91203	N/A		0.0325000	
CUMENE* 98828	N/A		0.0140000	
ETHYL BENZENE* 100414	N/A		0.4585000	
ETHYLENE GLYCOL* 107211	N/A		0.0005000	
METHYL ISOBUTYL KETONE* 108101	N/A		4.385	
TOLUENE* 108883	N/A		4.385	
(PLEASE SEE	ATTACHED	PAGE)		

8. PAGE NUMBER: 50 (Part B) REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION:
EMISSIONS FROM PROCESS EMISSION SOURCE/FUEL BURNING INSTALLATION/INCINERATOR
APC V.28

ATTACHMENT A

5. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). FUGITIVE EMISSIONS SHALL BE INCLUDED. ATTACH CALCULATIONS AND EMISSION FACTOR REFERENCES.				
AIR POLLUTANT	MAXIMUM ALLOWABLE EMISSIONS		ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 7, APC V.30)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 8, APC V.30)
BIS(2-ETHYLHEXYL)PHTHALATE* 117817	N/A		1.594	
XYLENES(ISOMERS & MIXTURE)* 1330207	N/A		7.236	

Calculations:
Using Potential to emit (8760 hrs/yr)
APC Form V.28

Six Spray Booths (82-0039-07)

Particulates

Actual (From production use and 90% efficiency of Spray Booth Filters)

Total Amount Used July 1, 1995 thru June 30, 1996 of all *spray finishes* -- 105,411 lbs
of which 21,945 lbs were solids

$$21,945 \text{ lbs} \times 10\% = 2,194.5 \text{ lbs/yr or } 1.09725 \text{ tons/yr of particulates}$$

NOTE: This amount will vary somewhat due to increases and decreases in production.

Allowables (includes fugitive emission amounts)

Listed on permit: 0.02 grains/DSCF

Flow Rates: (4) Stacks at 7,681.66 DSCFM and (2) Stacks at 5,693.47 DSCFM

$$4(7,681.66) + 2(5,693.47) = 42,113.58 \text{ DSCFM}$$

$$0.02 \text{ grains/DSCF} \times 1 \text{ lb/7000 grains} \times 42,113.58 \text{ DSCFM} \times 60 \text{ min/1 hr} \times 8760 \text{ hr/yr} \\ \times 1 \text{ ton/2000 lbs} = 31.62128235 \text{ tons/yr}$$

Volatile Organic Compounds (VOC's)

Actual -- 100% of VOC's is released into the atmosphere. Will be using Production use logs.

Total Amount used July 1, 1995 thru June 30, 1996 of *all finish materials* -- 109,675 lbs
of which 84,288 lbs were VOC's.

$$84,288 \text{ lbs} \times 1 \text{ ton/2000 lbs} = 42.144 \text{ tons/yr}$$

NOTE: This amount will vary somewhat due to increases and decreases in production.

Allowables (includes fugitive emission amounts)

Listed on permit: 207.1 tons/year

MAJOR SOURCE OPERATING APPLICATION
EMISSIONS SUMMARY FOR THE FACILITY OR FOR THE SOURCE CONTAINED IN THIS APPLICATION

1. FACILITY NAME:

Cortrim Hardwood Parts Company

2. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS AT THIS FACILITY OR FOR THE SOURCES CONTAINED IN THIS APPLICATION.

AIR POLLUTANT	SUMMARY OF MAXIMUM ALLOWABLE EMISSIONS		SUMMARY OF ACTUAL EMISSIONS	
	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 4, APC V.28)	TONS PER YEAR	RESERVED FOR STATE USE (LBS/HR-ITEM 4, APC V.28)
PARTICULATES (TSP)	364.6		46.517	
SULFUR DIOXIDE	90.491		11.808	
VOLATILE ORGANIC	207.1		48.365	
CARBON MONOXIDE	N/A		18.396	
NITROGEN OXIDES	N/A		9.417	
LEAD	N/A		N/A	
TOTAL REDUCED SULFUR	N/A		N/A	
MERCURY	N/A		N/A	
ASBESTOS	N/A		N/A	
BERYLLIUM	N/A		N/A	
VINYL CHLORIDE	N/A		N/A	
FLUORIDES	N/A		N/A	
GASEOUS FLUORIDES	N/A		N/A	

(CONTINUED ON NEXT PAGE)

EMISSIONS SUMMARY FOR THE FACILITY OR SOURCE CONTAINED IN THIS APPLICATION

3. COMPLETE THE FOLLOWING EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS THAT ARE HAZARDOUS AIR POLLUTANT(S). AT THIS FACILITY OR FOR THE SOURCES CONTAINED IN THIS APPLICATION.

[illegible]

8. PAGE NUMBER: 51 (Part B) REVISION NUMBER: N/A DATE OF REVISION: N/A

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

APC V.30

MAJOR SOURCE OPERATING PERMIT APPLICATION : CURRENT EMISSIONS REQUIREMENTS AND STATUS

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. EMISSION SOURCE NUMBER 82-0039-01			
3. DESCRIBE THE PROCESS EMISSION SOURCE/ FUEL BURNING INSTALLATION/ INCINERATOR. Wood Waste Boilers #1 & #2, (82-0039-01)					
4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTITONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
ENTIRE SOURCE	Sulpher Dioxide	Covered under current permit and TN A.P.C. Regulations 1200-3-14-.02(1)(b).	0.5 lbs/hr	0.14 lbs/hr	Source is in compliance.
ENTIRE SOURCE	Nitrous Oxides	Do not emit enough to be permitted for a specified amount according to TN A.P.C. Regulations 1200-3-27-.03	None listed on permits.	4.161 tons/yr	Source is in compliance according to permits.
ENTIRE SOURCE	Carbon Monoxide	None listed on permit. TN A.P.C. Regulation 1200-3-21-.01(1)	None listed on permit.	17.082 tons/yr	Source is in compliance according to permits.
ENTIRE SOURCE	Volatile Organic Compounds	None listed in 1200-3-6-.02.	None listed on permit.	6.132 tons/yr	Source is in compliance.
ENTIRE SOURCE	Particulates	Current permit restrictions, TN A.P.C. Regulations: 1200-3-19-.1(1)(a) and 1200-3-19-.11(2)(a)	Particulate: 0.55 grains/DSCF of exhaust gases corrected to 12% Carbon Dioxide. Opacity: not to exceed 10% for more than 5 min/hr or 20 minutes in any 24 hour period	0.068 grain/DSCF	Source is in compliance. Amounts may vary slightly with increases and decreases in production. Actual amounts reflect normal production rates.
11. PAGE NUMBER: 52		REVISION NUMBER: N/A		DATE OF REVISION: N/A	

MAJOR SOURCE OPERATING PERMIT APPLICATION: CURRENT EMISSIONS REQUIREMENTS AND STATUS
APC V.30

ATTACHMENT 1 SOURCE NUMBER 82-0039-01

[illegible]

MAJOR SOURCE OPERATING PERMIT APPLICATION : CURRENT EMISSIONS REQUIREMENTS AND STATUS

1. FACILITY NAME: Cortrim Hardwood Parts Company			2. EMISSION SOURCE NUMBER 82-0039-02		
3. DESCRIBE THE PROCESS EMISSION SOURCE/ FUEL BURNING INSTALLATION/ INCINERATOR. Scotch Marine Boiler (82-0039-02)					
4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICITONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
ENTIRE SOURCE	Particulates	TN A.P.C. Regulations: 1200-3-6-.02(2)(a) & 1200-3-5-.01	Particulate: 0.600 #/MM BTU Opacity: Not to exceed 20% opacity	.014285714 #/MM BTU	Source is in compliance.
ENTIRE SOURCE	Sulpher Dioxide	TN A.P.C. Regulation: 1200-3-14-.02(2)(a)	2.4 #/MM BTU	0.304285714 #/MM BTU	Source is in compliance
ENTIRE SOURCE	Nitrous Oxides	TN A.P.C. Regulations: 1200-3-27-.03. Does not meet requirements listed.	None listed on permits.	5.256 tons/yr	Source is in compliance.
ENTIRE SOURCE	Carbon Monoxide	TN A.P.C. Regulation: 1200-3-21-.01(1)	None listed on permits.	1.314 tons/yr	Source is in compliance.
ENTIRE SOURCE	Volatile Organic Compounds	TN A.P.C. Regulations: 1200-3-21-.01(1)	None listed on permit	0.089352 tons/year	Source is in compliance according to permit.
10. OTHER APPLICABLE REQUIREMENTS (NEW REQUIREMENTS THAT APPLY TO THIS SOURCE DURING THE TERM OF THIS PERMIT)					
ENTIRE SOURCE	N/A	N/A	N/A	N/A	N/A
11. PAGE NUMBER: 53		REVISION NUMBER: N/A		DATE OF REVISION: N/A	

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 9TH FLOOR, L & C ANNEX
 401 CHURCH STREET
 NASHVILLE, TN 37243-1531

APC V.30

MAJOR SOURCE OPERATING PERMIT APPLICATION : CURRENT EMISSIONS REQUIREMENTS AND STATUS

1. FACILITY NAME: Cortrim Hardwood Parts Company			2. EMISSION SOURCE NUMBER 82-0039-03		
3. DESCRIBE THE PROCESS EMISSION SOURCE/ FUEL BURNING INSTALLATION/ INCINERATOR. Wood Working Operations, Plant I (82-0039-03)					
4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
ENTIRE SOURCE	Particulates	TN A.P.C. Regulations: 1200-3-19-.11(1)(a), (b) & (c) 1200-3-19-.11(2)(b) & (c)	Opacity: from baghouses -- 10%; from cyclones -- 15% Particulate: each cyclone -- 0.02 grains/DSCF, 12'6" cyclone -- 4.77lbs/hr; from each baghouse -- 0.1 lbs/hr	Particulate: 4.46 lbs/hr	Source is in compliance.
10. OTHER APPLICABLE REQUIREMENTS (NEW REQUIREMENTS THAT APPLY TO THIS SOURCE DURING THE TERM OF THIS PERMIT)					
ENTIRE SOURCE	N/A	N/A	N/A	N/A	N/A
11. PAGE NUMBER: 54		REVISION NUMBER: N/A		DATE OF REVISION: N/A	

DEPT. OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 9TH FLOOR, L & C ANNEX
 401 CHURCH STREET
 NASHVILLE, TN 37243-1531

APC V.30

MAJOR SOURCE OPERATING PERMIT APPLICATION : CURRENT EMISSIONS REQUIREMENTS AND STATUS

1. FACILITY NAME: Cortrim Hardwood Parts Company		2. EMISSION SOURCE NUMBER 82-0039-06			
3. DESCRIBE THE PROCESS EMISSION SOURCE/ FUEL BURNING INSTALLATION/ INCINERATOR. Wood Working Operations, Plant II (82-0039-06)					
4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
ENTIRE SOURCE	Particulate	TN A.P.C. Regulations: 1200-3-19-.11(1)(a) {opacity}	Opacity: Not to exceed 10% opacity for an aggregate of more than 5 min in any 1 hour or more than 20 min in any 24 hour period.	Negligible	Source is in compliance.
10. OTHER APPLICABLE REQUIREMENTS (NEW REQUIREMENTS THAT APPLY TO THIS SOURCE DURING THE TERM OF THIS PERMIT)					
ENTIRE SOURCE	N/A	N/A	N/A	N/A	N/A
11. PAGE NUMBER: 55		REVISION NUMBER: N/A		DATE OF REVISION: N/A	

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

APC V.30

MAJOR SOURCE OPERATING PERMIT APPLICATION : CURRENT EMISSIONS REQUIREMENTS AND STATUS

1. FACILITY NAME: Cortrim Hardwood Parts Company			2. EMISSION SOURCE NUMBER 82-0039-07		
3. DESCRIBE THE PROCESS EMISSION SOURCE/ FUEL BURNING INSTALLATION/ INCINERATOR. Six Spray Booths (82-0039-07)					
4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
ENTIRE SOURCE	Particulates	TN A.P.C. Regulations -- Particulates: 1200-3-19-.11(2)(b) & Visible Emissions: 40 CFR, Volume 39, Number 219 Method 9	Particulate: Not to exceed 0.02 grains/DSCF Opacity: not to exceed 20% opacity	.00069 grains/DSCF of particulates	Source is in compliance.
ENTIRE SOURCE	Volatile Organic Compounds	By agreement with TN Department of Air Pollution Control, TN A.P.C. Regulations: 1200-3-19-.11(2)(b), 1200-3-18-.81(2)(a), 1200-3-18-.03(4)(a)	207.1 tons/yr	42.144 tons/yr NOTE: This amount will vary somewhat due to increases and decreases in production rates.	Source is in compliance.
10. OTHER APPLICABLE REQUIREMENTS (NEW REQUIREMENTS THAT APPLY TO THIS SOURCE DURING THE TERM OF THIS PERMIT)					
ENTIRE SOURCE	METHANOL	TN A.P.C. Regulation: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	1.4130 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	METHYL ETHYL KETONE	TN A.P.C.	NOT ANY AT THIS TIME	2.9705 tons/yr	Source is in
11. PAGE NUMBER: 56		REVISION NUMBER: N/A		DATE OF REVISION: N/A	

ATTACHMENT 1 SOURCE NUMBER 82-0039-07

4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
		Regulation: 1200-3-31-.02(6)			compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	NAPHTHALENE	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	.0325 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in productions.
ENTIRE SOURCE	CUMENE	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	0.0140 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	ETHYL BENZENE	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	0.4585 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	ETHYLENE GLYCOL	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	0.0005 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	METHYL ISOBUTYL	TN A.P.C.	NOT ANY AT THIS TIME	1.4340 ton/yr	Source is in
(PLEASE SEE NEXT PAGE)					

MAJOR SOURCE OPERATING PERMIT APPLICATION: CURRENT EMISSIONS REQUIREMENTS AND STATUS
APC V.30

ATTACHMENT 2 SOURCE NUMBER 82-0039-07

4. IDENTIFY IF ONLY PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN POLL. CONT. REGS. 40 CFR PERMIT RESTRICTONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS	9. COMPLIANCE STATUS (IN/OUT)
	KETONE	Regulations: 1200-3-31-.02(6)			compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	TOLUENE	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	4.3845 ton/year	Source is in compliance. Note: Amount may vary a small amount due to increases and decreases in production.
ENTIRE SOURCE	BIS(2-ETHYLHEXYL)PHTHALATE AKA DEHP,DOP,...	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	1.5940 tons/yr	Source is in compliance. Note: Amount may vary slightly due to increases and decreases in production.
ENTIRE SOURCE	XYLENES (ISOMERS & MIXTURE)	TN A.P.C. Regulations: 1200-3-31-.02(6)	NOT ANY AT THIS TIME	7.2355 tons/yr	Source is in compliance. Note: Amount will vary slightly due to increases and decreases in production.
(PLEASE SEE NEXT PAGE)					

MAJOR SOURCE OPERATING PERMIT APPLICATION
COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

1. FACILITY NAME:
Cortrim Hardwood Parts Company
2. LIST ALL THE PROCESS EMISSION SOURCE(S) OR FUEL BURNING INSTALLATION(S) OR INCINERATOR(S) THAT ARE PART OF THIS APPLICATION.
- (PLEASE SEE ATTACHMENT)
3. INDICATE THAT SOURCE(S) WHICH ARE CONTAINED IN THIS APPLICATION ARE PRESENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, BY CHECKING THE FOLLOWING.
- ☒ A. ATTACHED IS A STATEMENT OF IDENTIFICATION OF THE SOURCE(S) CURRENTLY IN COMPLIANCE. WE WILL CONTINUE TO OPERATE AND MAINTAIN THE SOURCE(S) TO ASSURE COMPLIANCE WITH ALL THE APPLICABLE REQUIREMENTS FOR THE DURATION OF THE PERMIT.
- ☒ B. APC V.30 FORM(S) INCLUDES NEW REQUIREMENTS THAT APPLY OR WILL APPLY TO THE SOURCE(S) DURING THE TERM OF THE PERMIT. WE WILL MEET SUCH REQUIREMENTS ON A TIMELY BASIS.

4. INDICATE THAT THERE ARE SOURCE(S) THAT ARE CONTAINED IN THIS APPLICATION WHICH ARE NOT PRESENTLY IN FULL COMPLIANCE, BY CHECKING BOTH OF THE FOLLOWING.
- N/A A. ATTACHED IS A STATEMENT OF IDENTIFICATION OF THE SOURCE(S) NOT IN COMPLIANCE, NON-COMPLYING REQUIREMENT(S), BRIEF DESCRIPTION OF THE PROBLEM, AND A PROPOSED SOLUTION.
- N/A B. WE WILL ACHIEVE COMPLIANCE ACCORDING TO THE FOLLOWING SCHEDULE:

ACTION	DEADLINE
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A
N/A	N/A

PROGRESS REPORTS WILL BE SUBMITTED:

START DATE: N/A AND EVERY 180 DAYS THEREAFTER UNTIL COMPLIANCE IS ACHIEVED.

5. STATE THE COMPLIANCE STATUS WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS THAT HAVE BEEN PROMULGATED UNDER SECTION 114(a)(3) OF THE CLEAN AIR ACT AS OF THE DATE OF SUBMITTAL OF THIS APC FORM V.31.
- N/A

6. PAGE NUMBER: 57 REVISION NUMBER: N/A DATE OF REVISION: N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION: COMPLIANCE PLAN AND
COMPLIANCE CERTIFICATION
APC V.31

ATTACHMENT A

2. LIST ALL THE PROCESS EMISSION SOURCE(S) OR FUEL BURNING INSTALLATION(S)
OR INCINERATOR(S) THAT ARE PART OF THIS APPLICATION

Wood Waste Boilers #1 & #2 (82-0039-01)
Scotch Marine Boiler (82-0039-02)
Wood Working Operations, Plant I (82-0039-03)
Wood Working Operations, Plant II (82-0039-06)
Six Spray Booths (82-0039-07)

MAJOR SOURCE OPERATING PERMIT APPLICATION: COMPLIANCE PLAN AND
COMPLIANCE CERTIFICATION
APC V.31

ATTACHMENT B

3. INDICATE THAT SOURCE(S) WHICH ARE CONTAINED IN THIS APPLICATION ARE PRESENTLY
IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS.

A. ATTACHED IS A STATEMENT OF IDENTIFICATION OF THE SOURCE(S) CURRENTLY IN
COMPLIANCE. WE WILL CONTINUE TO OPERATE AND MAINTAIN THE SOURCE(S) TO ASSURE
COMPLIANCE WITH ALL THE APPLICABLE REQUIREMENTS FOR THE DURATION OF THE PERMIT.

Wood Waste Boilers #1 & #2 (82-0039-01)
Scotch Marine Boiler (82-0039-02)
Wood Working Operations, Plant I (82-0039-03)
Wood Working Operations, Plant II (82-0039-06)
Six Spray Booths (82-0039-07)

MAJOR SOURCE OPERATING PERMIT APPLICATION: COMPLIANCE PLAN AND
COMPLIANCE CERTIFICATION
APC V.31

ATTACHMENT C

4. INDICATE THAT THERE ARE SOURCE(S) THAT ARE CONTAINED IN THIS APPLICATION WHICH ARE NOT PRESENTLY IN FULL COMPLIANCE. REQUIREMENTS.
- A. ATTACHED IS A STATEMENT OF IDENTIFICATION OF THE SOURCE(S) NOT IN COMPLIANCE, NON-COMPLYING REQUIREMENT(S). BRIEF DESCRIPTION OF THE PROBLEM, AND A PROPOSED SOULUTION.

N/A

MAJOR SOURCE OPERATING PERMIT APPLICATION - APPLICATION COMPLETENESS CHECK LIST

I. IDENTIFICATION INFORMATION

☒ COMPLETE ☐ INCOMPLETE ☐ NOT APPLICABLE

A. FACILITY INFORMATION

FACILITY NAME, LOCATION & MAILING ADDRESS ☒ YES ☐ NO
PERMIT CONTACT PERSON ☒ YES ☐ NO
RESPONSIBLE OFFICIAL ☒ YES ☐ NO
PERMIT REQUESTED ☒ YES ☐ NO

B. SOURCE DESCRIPTION

1. OPERATIONAL INFORMATION:

SIC CODE(S) ☒ YES ☐ NO
LISTING AND DESCRIPTION OF EMISSION SOURCE(S) ☒ YES ☐ NO

2. IDENTIFICATION AND DESCRIPTION OF ALTERNATE OPERATING SCENARIOS (IF APPLICABLE) ☐ YES ☐ NO ☒ N/A

C. PERMIT SHIELD REQUESTED

☒ YES ☐ NO ☐ N/A

II. EMISSIONS INFORMATION

☒ COMPLETE ☐ INCOMPLETE ☐ NOT APPLICABLE

A. QUANTIFICATION OF ALL EMISSIONS OF REGULATED AIR POLLUTANTS ☒ YES ☐ NO

B. EMISSION SOURCES:

IDENTIFICATION AND DESCRIPTION OF ALL EMISSION SOURCES IN SUFFICIENT DETAIL TO ESTABLISH THE BASIS FOR FEES AND APPLICABLE REQUIREMENTS ☒ YES ☐ NO

A LIST OF INSIGNIFICANT EMISSIONS UNITS OR ACTIVITIES EXEMPTED BECAUSE OF SIZE OR PRODUCTION RATE ☐ YES ☐ NO ☒ N/A

C. PROCESS INFORMATION TO THE EXTENT IT IS NEEDED TO DETERMINE OR REGULATE EMISSIONS:

FUELS ☒ YES ☐ NO ☐ N/A
RAW MATERIALS/MATERIALS USED ☒ YES ☐ NO ☐ N/A
PRODUCTION RATES ☒ YES ☐ NO ☐ N/A

D. FOR REGULATED AIR POLLUTANTS, LIMITATIONS ON SOURCE OPERATIONS AFFECTING:

EMISSIONS ☒ YES ☐ NO ☐ N/A
ANY WORK PRACTICE STANDARDS ☐ YES ☐ NO ☒ N/A

E. OTHER INFORMATION REQUESTED BY ANY APPLICABLE REQUIREMENTS FOR ALL REGULATED AIR POLLUTANTS SUCH AS:

UTM COORDINATES OF EMISSION SOURCES ☒ YES ☐ NO ☐ N/A
FLOW RATES ☒ YES ☐ NO ☐ N/A
STACK PARAMETERS ☒ YES ☐ NO ☐ N/A

F. CALCULATIONS ON WHICH EMISSIONS RELATED INFORMATION ARE BASED

☒ YES ☐ NO ☐ N/A

III. APPLICABILITY		<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
A. CITATION AND DESCRIPTION OF ALL APPLICABLE REQUIREMENTS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
B. OTHER SPECIFIC INFORMATION THAT MAY BE NECESSARY TO IMPLEMENT AND ENFORCE OTHER APPLICABLE REQUIREMENTS OF RULE 1200-3-9-.02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS OR TO DETERMINE THE APPLICABILITY OF REQUIREMENTS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
C. AN EXPLANATION OF ANY PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS		<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> X N/A
IV. COMPLIANCE		<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
A. COMPLIANCE STATUS				
1. A DESCRIPTION OF THE COMPLIANCE STATUS OF THE SOURCE WITH RESPECT TO ALL APPLICABLE REQUIREMENTS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
2. FOR APPLICABLE REQUIREMENTS WITH WHICH THE SOURCE IS IN COMPLIANCE, A STATEMENT THAT THE SOURCE WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
3. FOR APPLICABLE REQUIREMENTS THAT WILL BECOME EFFECTIVE DURING THE PERMIT TERM, A STATEMENT THAT THE SOURCE WILL MEET SUCH REQUIREMENTS ON A TIMELY BASIS		<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> X N/A
4. FOR REQUIREMENTS FOR WHICH THE SOURCE IS NOT IN COMPLIANCE AT THE TIME OF PERMIT ISSUANCE, A NARRATIVE DESCRIPTION OF HOW THE SOURCE WILL ACHIEVE COMPLIANCE WITH SUCH REQUIREMENTS		<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> X N/A
5. IDENTIFICATION AND DESCRIPTION OF AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES OR ACTIVITIES		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
6. DESCRIPTION OF OR REFERENCE TO ANY APPLICABLE TEST METHOD FOR DETERMINING COMPLIANCE WITH EACH APPLICABLE REQUIREMENT		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
B. COMPLIANCE SCHEDULE		<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
1. A SCHEDULE OF COMPLIANCE FOR SOURCES THAT ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE		<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> X N/A
2. A SCHEDULE FOR SUBMISSION OF CERTIFIED PROGRESS REPORTS NO LESS FREQUENTLY THAN EVERY SIX MONTHS FOR SOURCES REQUIRED TO HAVE A SCHEDULE OF COMPLIANCE TO REMEDY A VIOLATION		<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> X N/A
C. COMPLIANCE CERTIFICATION		<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
1. CERTIFICATION OF COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY A RESPONSIBLE OFFICIAL		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
2. A STATEMENT OF METHODS USED FOR DETERMINING COMPLIANCE, INCLUDING A DESCRIPTION OF MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
3. A SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	
4. A STATEMENT INDICATING THE SOURCE'S COMPLIANCE STATUS WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS OF THE FEDERAL ACT		<input checked="" type="checkbox"/> X YES	<input type="checkbox"/> NO	

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YH/_____

RECEIVED

STATE OF TENNESSEE
TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1531

JUN 27 1997

PERMITS AND COMPLIANCE TECHNOLOGY BRANCH
EPA - REGION 4
ATLANTA, GA

JUN 23 1997

Ms. Carla Pierce
Chief, Operating Permits Section
Environmental Protection Agency, Region IV (APTMD)
Atlanta Federal Center
100 Alabama Street, Southwest
Atlanta, GA 30303

Re: 82-0039, Title V Permit

Dear Ms. Pierce:

Enclosed for your information is a copy of the Division's major source (Title V) operating permit and the public notice for:

Cortrim Hardwood Parts Company
1320 Georgia Avenue
Bristol, TN 37620

This notice will be placed in the legal section of the *Bristol Herald Courier/Bristol Virginia - Tennessean*. You are invited to review and comment. You agreed to treat this draft permit as a proposed permit and to perform your 45-day review concurrently with the public notice period.

Please feel free to contact Vergil Murrell at 615-532-0607 or Tupili Reddy at 615-532-0589 if you have any questions or comments concerning this source.

Sincerely,

John W. Walton, P.E.
Director
Tennessee Air Pollution Control Division

Enclosure - a copy of the draft permit and a copy of the public notice

PUBLIC NOTICE

Cortrim Hardwood Parts Company has applied to the Tennessee Air Pollution Control Division (TAPCD) for a major source operating permit subject to the provisions of paragraph 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations (also frequently referred to as Title V regulations). A major source (Title V) operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations.

The applicant is Cortrim Hardwood Parts Company with a site address of 1320 Georgia Avenue, Bristol, TN. They seek to obtain a major source operating permit for operation of an air contaminant source(s) as follows:

Source 01 - Wood-Waste Boilers #1 & #2
Source 03 - Woodworking Operation
Source 06 - Woodworking Operation
Source 07 - Six (6) Spray Booths for Coating Wood Caskets

A copy of the application materials used by the TAPCD and a copy of the draft permit are available for public inspection during normal business hours at the following locations:

Bristol Public Library
701 Goode Street
Bristol VA 24201-4199

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be made within thirty (30) days of the date of this notice and should be addressed to **Mr. John W. Walton, Director, Air Pollution Control Division, 9th Floor, L & C Annex, 401 Church Street, Nashville, Tennessee 37243-1531.** Questions concerning the source(s) may be addressed to Vergil Murrell at the same address or by calling 1-(800)-511-7991 or (615)-532-0607. The U.S. Environmental Protection Agency (EPA) has agreed to treat this draft permit as a proposed permit and to perform its 45-day review concurrently with the public notice period. A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Issac Okoreeh-Baah, 7th Floor Annex, 401 Church Street, Nashville, TN 37243, (615) 532-0059. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

For the *Bristol Herald Courier/Bristol Virginia-Tennessean* -- publish once on or before Monday July 7, 1997.

Air Pollution Control

DATE: JUNE 23, 1997

Assigned to - Vergil Murrell

No alterations to the above are allowed:

Air Pollution Control must be furnished with an affidavit from the newspaper stating that the ad was run and the date of the ad or one complete sheet from the newspaper showing this advertisement, the name of the newspaper and the date of publication. Mail to Vergil Murrell, Air Pollution Control Division, 9th Floor, L & C Annex, 401 Church Street, Nashville, Tennessee 37243-1531.

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15



RECEIVED
EPA REGION IV

Nov 16 2 25 PM '98

ENVIRONMENTAL ASSISTANCE CENTER
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
2305 SILVERDALE ROAD
JOHNSON CITY, TENNESSEE 37601-2162
(423) 854-5400 STATEWIDE 1-888-891-8332 FAX (423) 854-5401
COMPLIANCE SECTION

November 10, 1998

Mr. Robert D. Spiegel, Jr.
Cortrim Hardwood Parts Company
P.O. Box 919
Bristol, Tennessee 37621

RE: Hazardous Waste Inspection
TND 00-338-7735

Dear Mr. Spiegel:

This letter confirms the observations which were made during the hazardous waste inspection conducted at Cortrim Hardwood Parts Company on November 5, 1998. Specifically, the standards for hazardous waste Small Quantity Generators were addressed. This inspection was conducted to evaluate compliance with the applicable requirements of the Tennessee Hazardous Waste Management Act, TCA 68-212 parts 1 and 3 and the Used Oil Collection Act of 1993, T.C.A. 68-211 part 10.

The attached inspection report verifies that no violations were identified during the inspection.

If you have any questions or comments on the accuracy of this correspondence, do not hesitate to contact me at 854-5434.

Sincerely,

Bethanie Glynn
Division of Solid Waste Management

Attachment

cc: Ms. Kristin Lippert, EPA, Region IV, Atlanta
DSWM, Nashville
DSWM, JCFO File # 82-65 15

D488628

Hazardous Waste Inspection Report

Site/Physical Location:

Cortrim Hardwood Parts Company
TND 00-338-7735
1320 Georgia Avenue
Bristol, Tennessee 37620
Sullivan Co.

Primary Contact(s):

Robert D. Spiegel, Jr., Plant Engineer
Cortrim Hardwood Parts company
P.O. Box 919
Bristol, Tennessee 37621
423/764-6127

Date and Time of Inspection:

November 5, 1998; Starting at 9:00 a.m.

Inspection Participants:

Robert D. Speigel, Jr., Plant Engineer, Cortrim
Robin Price, Project Engineer, Cortrim
John Webb, DSWM
Bethanie Glynn, DSWM

Report Prepared By:

Bethanie Glynn
Division of Solid Waste Management
2305 Silverdale Road
Johnson City, Tennessee 37601
423/854-5434

Purpose of Inspection:

This inspection was conducted to evaluate Cortrim Hardwood Parts Company's compliance with the applicable requirements of the Rules and Regulations promulgate pursuant to the Hazardous Waste Management Act, T.C.A. 68-212 parts 1 and 3 and Used Oil Collection Act of 1993, T.C.A. 68-211 part 10.

Facility Description:

Cortrim Hardwood Parts Company manufactures wooden furniture parts for other industries. Cortrim also manufactures wooden caskets as a finished product. (SIC 3995).

Inspection Findings:

Based on the information provided to the Division, Cortrim Hardwood Parts Company is a Small Quantity Generator. A description of the processes and wastes generated is as follows:

- A. Raw lumber is stored at the site. Lumber is dipped in a solution containing ammonium chloride and water for fungus control. The ammonium chloride replaced previously used sodium pentachlorophenate. This solution is maintained in a 5,000 gallon open top tank. The lumber is allowed to air dry over the tank before it is sorted and stacked onto pallets. No waste has been removed from the tank since the operation began.
- B. The pallets of lumber are placed in kilns to dry. The lumber is dried at temperatures between 90 F and 200 F for one to two weeks depending on the type of wood. The kilns are heated by the boilers. The boilers burn wood scraps and saw dust. Fume hoods over the various cutting machines collect saw dust and transport it to a bin where it is stored with other wood scraps. The wood is then augered to the boilers for fuel. The boilers are treated with an oxygen scavenger (removes free oxygen to prevent corrosion of the pipes) and a neutralizer (water softener) during normal operations. The solids from the boilers are blown down three times a day, discharging approximately 150 gallons of water and solids to the Bristol sanitary sewer.
- C. Furniture and casket parts are crafted in the main building. Non-hazardous polyvinyl glue is used to secure parts. Brushes and machine rollers, used to spread the glue, are cleaned in a tub containing water. The water is discharged to the Bristol sanitary sewer. All wiping rags are cleaned and reused. The unfinished furniture is shipped offsite. The casket parts are moved to the Casket Building.
- D. The machine shop is located in the main building. Rotor blades and other cutting tools are made here. Non-hazardous water based coolant and water are circulated through the machines. Spent coolant is discarded to the Bristol sanitary sewer.
- E. In the Casket Building, caskets are assembled and finished. Stain is applied by hand and stain and lacquer is applied with spray equipment in booths. Stripping operations are done in the booths on a table that collects the thinner/stripper and drains it to an in-line collection bucket. Spent lacquer and lacquer thinner generated from cleaning of spray equipment is collected in fifty five gallon drums and stored in the hazardous waste accumulation area. Two drums were present with accumulation start dates of 10-16-98 & 11-2-98. Review of the manifests indicated the following shipments of D001, F003, F005 hazardous waste by Prillaman Chemical Corp (VAD 00-311-1416):

10-16-98	165 g	05-20-97	165 g
08-11-98	165 g	03-10-97	110 g
05-19-98	165 g	12-11-96	165 g
02-23-98	220 g	10-28-96	165 g
09-18-97	110 g	08-26-96	165 g
08-21-97	110 g	07-23-96	165 g
07-09-97	110 g	06-26-96	165 g
		03-29-96	165 g

Landban Notification accompanied all shipments.

- F. Safety Kleen non-hazardous parts cleaning solution is used to clean machine parts in the Maintenance building. Painting is done with spray cans and some brush work. Brushes are cleaned in the Safety Kleen solution. Scrap metal generated from machining operations is sold to Twin City Metal. Lubricant is applied with a spray can to the machining tools. The 55 gallon containers of product and used oil are stored behind the Maintenance Building. Used oil is managed by Necessary Oil.

The Annual Report was properly submitted and fees paid.

The Waste Reduction Plan was reviewed.

Violations

No violations were identified during this compliance evaluation.

Signed: Bethanne Gynne Date: 11-10-98

Reviewed: Fred Willingham Date: 11-10-98

BWG/ 82-65 15

SENT TO: J. W. DARD

DIVISION OF SOLID WASTE MANAGEMENT
INSPECTION & COMPLIANCE (I&C)

FOR OFFICE USE: RCIS DATE: COMPLY DATE: INSP SET:

INSPECTION STATUS () LQG () SQG () CESSG () NON GEN () TRANSPORT () TSD () NNF () STATUS CHANGE	<input type="radio"/> 00 NCO	EPA INSTALLATION ID NUMBER	PERMIT NUMBER	FIELD OFFICE FILE NUMBER	
	<input type="radio"/> 01 JACK	TND 00-338 7735	-	82-05 13	
	<input type="radio"/> 02 NASH	FACILITY OR SITE CORRIM HILLYWOOD PAPER CO.			
	<input type="radio"/> 03 KNOX	ADDRESS 1320 GEORGIA AVE			
	<input type="radio"/> 04 JCITY	CITY	STATE	ZIP CODE	COUNTY
<input type="radio"/> 05 CHATT	<input type="radio"/> 06 MEMPH	BRISTOL	TN	37620	SULLIVAN
<input type="radio"/> 12 COOK					

KEY DATE	INSP DATE	INSP TYPE (FROM TABLE)	NOV DATE	NOV #	SUBMITTED BY	STAFF ID#	DATE SUBMITTED
11-5-98	11-5-98	402	-	-	Bethanne Lynn	406	11-10-98
		403					
		190					

CEI 4 401 LQG 402 SQG 403 TRANSPORTER 404 TSDR w/GW 405 TSDR noGW 406 TSDRW/CME 407 TSDRW/O&M 408 LDR 409 NNF	190 UO GENERATOR	502 CLOSURE EVAL	SPL 5	706 MNFST REPORTS	INC 9
	250 UO TNSPTR/TNSFR	503 POST CLOSURE	601 GENERATED WASTE	706 MNFST RECDs	901 ORAL CMPLT
	800 UO PROCESSOR	504 SPEC WASTE	602 RECEIVED WASTE	707 GWM DATA	902 WRITTEN CMPLT
	810 UO MARKETER	505 COMPLAINT F/U	603 SOIL/SEDIMENT	708 GWM PLANS	903 EMER RESP
	820 UO BURNER	506 EMER RESPONSE	604 SURFACE WATER LEACHATE	709 LATE ANN RPT	904 OTHER
	830 UO RE-REFINER	507 OTHER	605 GROUNDWATER	710 OTHER	OTH 10
	840 UO COLLECTION CTR	508 BIF	#SAMPLES	CSE 8	101 FAC MEETG/ATR
	850 UO DO-IT YOURSELFER	509 INCINERATOR	NRR 7	801 F/U VISIT	102 OTHER
	OTH 5	510 COCTRIL BURN		802 F/U REC ZEYV	DATE RECEIVE
	501 WALK THROUGH				

SUBSTITUTE: Y__N__ COMMITMENT: Y__N__ SHARED: Y__N__

RCIS SEQ #	RULE CITED	VIOLATION RELATES TO?	CLASS	COMPLIANCE DUE DATE	DATE RESOLVED
1	1200-1-11-		A B C R		
2	1200-1-11-		A B C R		
3	1200-1-11-		A B C R		
4	1200-1-11-		A B C R		
5	1200-1-11-		A B C R		
6	1200-1-11-		A B C R		
7	1200-1-11-		A B C R		
8	1200-1-11-		A B C R		
9	1200-1-11-		A B C R		
10	1200-1-11-		A B C R		
11	1200-1-11-		A B C R		
12	1200-1-11-		A B C R		

NO VIOLATIONS

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04-2001-1110

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 25 2001

4APT-AEEB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert D. Spiegle, Jr.
President/Owner
Cortrim Hardwood Parts Company
1320 Georgia Avenue
Bristol, Tennessee 37620

SUBJ: Clean Air Act Compliance Order
EPA Docket No. CAA-4-2001-1772

Dear Mr. Spiegle:

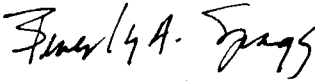
Pursuant to Section 113(a)(3) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a)(3), the Environmental Protection Agency (EPA) is issuing the enclosed Order, requiring Cortrim Hardwood Parts Company, to comply with the requirements for the Title V permitting regulations at its facility, located in Bristol (Sullivan County), Tennessee (the facility).

This Order is based on information in EPA's possession indicating that the facility has violated Section 114(a)(3) of the Act, 42 U.S.C. § 7414 (a)(3), and 40 C.F.R. § 70.6(c)(5). The regulation found at 40 C.F.R. § 70.6(c)(5) requires the permittee to periodically (but no less frequently than annually) certify that the facility is in compliance with all applicable requirements of the permit. The permittee is required to submit all compliance certifications to the Administrator as well as to the permitting authority. Any violations of the terms of the enclosed Order may subject the facility to a civil action for appropriate relief under Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a). In addition, Section 113(c) of the Act provides for criminal penalties for knowing violations of an Order.

You have the opportunity to request a conference with EPA to discuss this Order before it becomes effective in accordance with 42 U.S.C. § 7413(a)(4). However, if Cortrim Hardwood Parts Company, does not request such a conference within seven (7) calendar days of receipt of this Order, or cannot meet with EPA within fourteen (14) calendar days of receipt of this Order, this Order shall be effective immediately upon receipt by the facility. If a conference is held

between the facility and EPA, this Order shall become effective upon the day of the conference unless otherwise agreed upon at the conference. If you have any questions or would like to meet with representatives of EPA to discuss the Order, please contact Rosalyn D. Hughes at (404) 562-9206.

Sincerely,


Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. Barry Stephens, TDEC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:

Cortrim Hardwood Parts Company
Bristol, Tennessee

RESPONDENT

)
) Docket No. CAA-04-2001-1772
)
) Proceeding Under Clean Air Act,
) Section 113 (a)(3)(B)
)
)
)

COMPLIANCE ORDER

I. STATUTORY AUTHORITY

This Compliance Order (Order) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) by Section 113(a) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a). The Administrator has delegated this authority to the Regional Administrator of EPA Region 4, who in turn delegated it to the Director, Air, Pesticides and Toxics Management Division of EPA Region 4 (Complainant).

II. FINDINGS

1. Cortrim Hardwood Parts Company (Respondent), is the owner and operator of a Part 70 source located in Bristol (Sullivan County), Tennessee, which is subject to the requirements of 40 C.F.R. Part 70, as approved by EPA for the Tennessee on July 29, 1996, in 61 FR 39335 and Tennessee Air Pollution Code Chapter 1200-3-0-.02.

2. Pursuant to 40 C.F.R. § 70.1(b), all sources subject to 40 C.F.R. Part 70 shall have a permit to operate that assures compliance by the source with all applicable requirements, as defined by 40 C.F.R. § 70.2.

3. In accordance with the requirements of 40 C.F.R. Part 70 and Tennessee regulations at Chapter 1200-3-9-.02, Respondent was issued a Title V operating permit by Tennessee on October 15, 1997.
4. Pursuant to Section 503(b)(2) of the Act, 42 U.S.C. § 7661b(b)(2), and 40 C.F.R. §§ 70.5(c)(9) and 70.6(c)(5), the permittee is required to periodically (but no less frequently than annually) certify that the facility is in compliance with all applicable requirements of the permit.
5. Pursuant to 40 C.F.R. § 70.6(c)(5), the permittee is required to submit all compliance certifications to the Administrator as well as to the permitting authority.
6. Pursuant to the Title V operating permit issued to Respondent, the compliance certification is due to the EPA by May 31st after the end of the reporting period.
7. Pursuant to the Respondent's permit, Respondent was required to submit a compliance certification for the year starting April 1, 2000, and ending March 31, 2001, to the Regional Administrator of EPA Region 4 by May 31, 2001.
8. According to EPA records for compliance certifications, as of September 20, 2001, Respondent had not submitted a compliance certification to the Regional Administrator of EPA, Region 4.

III. ORDER

Based upon the findings set forth above, IT IS HEREBY ORDERED, pursuant to Section 113(a)(3)(B) of the Act, 42 U.S.C. § 7413(a)(3)(B):

9. The provisions of this Order shall apply to Respondent and its officers, agents, servants, employees, successors, and to all persons, firms, and corporations acting under, through, or for Respondent.

10. Respondent shall submit to the Administrator of EPA Region 4, a certification of compliance with permit terms and conditions in accordance with 40 C.F.R. § 70.6(c)(5), including emission limitations, standards or work practices for the year starting April 1, 2000, and ending March 31, 2001, within fourteen (14) calendar days of receipt of this Order.

11. This Order only addresses the Respondent's responsibilities under 40 C.F.R. Part 70 and in no way affects Respondent's obligations to comply with other local, state, or federal laws and regulations.

12. If Respondent fails to comply with the above, EPA has the right to take enforcement action for failure to comply with this Order.

13. This Order is effective upon receipt by Respondent.

IV. ENFORCEMENT

Section 113(a) of the Act provides that EPA may take any of the following enforcement actions based upon the findings of this Order and/or failure to comply with the above Order:

- issue an administrative penalty order pursuant to Section 113(d) of the Act for civil administrative penalties of up to \$27,500 per day of violation; or
- bring a civil action pursuant to Section 113(b) of the Act for injunctive relief or civil penalties of not more than \$27,500 per day for each violation.

Furthermore, for any person who knowingly violates the provisions of the Act as set forth in Section 113(c), Section 113(c) provides for criminal penalties or imprisonment, or both. Under Section 306 of the Act, the regulations promulgated thereunder (40 C.F.R. Part 15), and Executive Order 11738, facilities to be utilized in federal contracts, grants, and loans, must be in full compliance with the Act and all regulations promulgated thereto. Violation of the Act may

result in the subject facility or other facilities owned or operated by the Respondent being declared ineligible for participation in any Federal contract, grant or loan program.

V. PENALTY ASSESSMENT CRITERIA

If a penalty is assessed under Sections 113(b) or (d), Section 113(e)(1) of the Act states that the Administrator or the court, as appropriate, shall, in determining the amount of penalty to be assessed, take into consideration (in addition to such other factors as justice may require) the size of the business, the economic impact of the penalty on the business, the violator's full compliance history and good faith efforts to comply, the duration of the violation as established by any credible evidence (including evidence other than the applicable test method), payment by the violator of penalties previously assessed for the same violation, the economic benefit of non-compliance, and the seriousness of the violation.

Section 113(e)(2) of the Act allows the Administrator or the court to assess a penalty for each day of the violation. For purposes of determining the number of days of the violation, where EPA makes a prima facie showing that the conduct or events giving rise to this violation are likely to have continued or recurred past the date of this notice or any prior notice of the same violation, the days of violation shall be presumed to include the date of the notice and each and every day thereafter until Respondent establishes that continuous compliance has been achieved, except to the extent that Respondent can prove by the preponderance of the evidence that there were intervening days during which no violation occurred or that violation was not continuing in nature.

This Order does not prevent the State or EPA from assessing any penalties nor otherwise affect or limit the State's or the United States' authority to enforce under other provisions of the Act, nor affect any person's obligations to comply with a term or condition of any permit or applicable implementation plan.

VI. EFFECTIVE DATE

In accordance with Section 113(a)(4) of the Act, EPA is providing Respondent with an opportunity for a conference to discuss the violation which is the subject of this Order. If Respondent does not request a conference within seven (7) calendar days of receipt of this Order, or cannot meet with EPA within fourteen (14) calendar days of receipt of this Order, this Order shall be effective immediately upon receipt by Respondent. If a conference is held between Respondent and EPA Region 4, this order shall become effective upon the day of the conference unless otherwise agreed upon at the conference. The conference, if requested, will afford Respondent an opportunity to present information bearing on the findings of this Order, on any efforts Respondent has taken to achieve compliance, and on the steps Respondent proposes to take to achieve compliance.

9/25/01
Date of Issuance

Winston A. Smith
Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

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Advanced Tank Certification

Emory Park
673 Emory Valley Road
Oak Ridge, TN 37830

Phone: 615/482-6901 or 1-800-365-TEST

Telecopy: 615/481-3834



CORTRIM HARDWOOD PARTS COMPANY, BRISTOL, TENNESSEE

TANK TEST METHODOLOGY

TESTING EQUIPMENT: The precision leak detection system used for this test was the ATC MicroTector Probe System. The MicroTector System is approved for use in the State of Florida, is the only state with an equipment certification program. This unique equipment consists of two probes capable of detecting liquid level changes of 1 mil (1/1000 inch). This system is designed to detect leaks of 0.02 gal/hr in 10,000 gallon tanks. One probe measures the level of the liquid in the tank and is on the outside of the MicroTector System; the other probe is located inside the internal reference cell. The reference cell is the heart of the system and provides an internal correction mechanism for liquid level changes caused by temperature and atmospheric pressure changes. The level changes in the control volume contained within the reference cell mimic the level changes in the tank caused by factors such as expansion or contraction of the liquid due to temperature and pressure, evaporation and stratification. These external changes are especially important for tanks containing hydrocarbons, but they are also important for precision testing of tanks containing other liquids.

TESTING PROCEDURES

VOLUMETRIC TANK TESTING: Underground storage tanks are tested using the following standard test procedures. The valve on the bottom of the reference cell is opened and the MicroTector System is placed in the tank. The system is adjusted such that the liquid/gaseous interface is approximately in the middle of the "active" region, which is approximately 0.8 inch in length. Once the electronics of the system stabilize, the valve at the bottom of the reference cell is closed and the test begins. The system must then reach equilibrium, which is indicated when the chart output has minimal slope (normally between 15 and 30 minutes). The test is then run for a period of time determined by the operator based upon his analysis of the computer display. At the completion of each test the system's response is calibrated using a known volume. The results are then analyzed to determine the presence or absence of a leak.

VOLUMETRIC LINE TESTING: Product lines are tested using protocol and equipment based upon hydrostatic volumetric procedures. The equipment consists of a hydrostatic pump, pressure gauges, volumetric measuring apparatus, and associated hoses and fittings. The protocol provides for pressurization of the lines to approximately one and one-half times normal operating pressure and measurement of product losses over a fixed period of time. Line leak rates are calculated based on careful measurement and recording of the volume of fuel that is added to the system over a measured period of time to maintain a pressure of 50 psig.

The NFPS 29 recommends that a liquid loss of more than 0.05 gallons per hour during timed restoration may indicate a leak in the piping. Both EPA and NFPA dictate that the volumetric hydrostatic line test be accomplished under one and one-half times normal line operating pressure. The Federal EPA rules do not specify an indicated rate of leakage to be probable evidence of a leak, or to require reporting.

The manufacturer of ATC's line testing equipment states in its operation literature that acceptable tolerance in a pressurized system is .010 gallons per hour and in a suction system is .025 gallons per hour.

BASIS FOR TANK CERTIFICATION

The computer generated single-line plot represent the difference in level measured by the internal (reference) probe and the external (in tank) probe. If the levels measured by the probes immersed in the reference and tank volumes do not change, or change up or down by the same amount, then the plot will show no slopes deviation. If there is a leak in the tank, that level will decrease with time while the reference level does not. Thus, the plot will indicate a negative slope. The slope will be related to the level change per unit time.

The measured response of the control volume is used to accept or reject each test. According to the EPA, the equipment must be able to detect leaks of at least 0.10 gal/hr. The NFPA has established a detection level of 0.05 gallons per hour detection limit. We have set our acceptance criteria at a lower level. If the slope equates to less than 40 percent of the minimum detectable leak (0.020 gal/hr) then the results are interpreted as an indication of no leak. If results are greater than the acceptance level (0.020 gal/hr), they are classed as negative, and the test is repeated. Two negative results are interpreted as an indication of a leak.

As with any measuring device, there is a margin of error that is caused by factors other than the parameters being measured (in this case, liquid level). With this equipment, slight variations in slope have been observed due to the slight barrier effect caused by the reference cell wall and electronic drift caused by variations in the probes. Slope changes of less than 0.01 gallons per hour are considered to be due to these causes. Slope changes of between 0.011 and 0.020 gallons per hour (increase or decrease) are considered as non-leaking.

LINE LEAK DETECTION LIMITATIONS

The product change rates detailed in this report were calculated using the hydrostatic line test procedures required by EPA which dictate testing with one and one-half times normal operating pressure. Actual leak rates over time may vary from those indicated by this testing procedure.

CORTRIM HARDWOOD PARTS COMPANY, BRISTOL, TENNESSEE

TEST RESULTS

INTRODUCTION

Advanced Tank Certification, Inc. (ATC) was retained by Cortrim Hardwood Parts Company to perform precision leak detection on four underground storage tanks and one above ground tank at their location on 1320 Georgia Ave., Bristol, TN. This report details the results of the following four underground tanks tested on 3/9/89: Tank 1 - 2,000 Gal. Regular, Tank 2 - 2,000 Gal. Regular, Tank 3 - 2,000 Ga. Regular, and Tank 4 - 20,000 Diesel (test results on Tank 5 - the above ground tank, will be provided in a separate report). Associated piping was tested on the three Regular tanks. The layout of this location is shown in the attached drawing (not to scale). Before ATC personnel initiated the testing program, the tanks were to be filled to a level a few inches into the fill pipes. Weather conditions on 3/9/89 at test time ranged from 32 - 55 degrees F. and clear.

RESULTS

Field notes and a graphical representation of the data for the tank leak detection are attached to this report.

TANK 1:

A 24 inch section of the fill pipe on this system was above ground and exposed to the sunlight. The sun was heating the fuel in the fill pipe and it was rising rapidly. Therefore, a shelter was built around this section to shade the fill pipe and test equipment approximately 35 minutes into this test. At the point at which the system was sheltered, it is obvious on the test analysis printout that the product levelled off with no additional rise. The Tank 1 (R) test was calibrated with a volume of 30 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line superimposition indicates a slight positive slope, equivalent to a product level change of .018 gallons per hour. This is within the acceptance criteria established above.

REGULAR LINES:

The Tank 1 Regular lines were tested hydrostatically, in attempts to maintain pressure during the test phase. However, these

Regular lines would not hold pressure for a time period long enough to compute a leak rate. Product was observed draining back into the tank when pressure was applied to the lines, indicating faulty check-valves.

TANK 2, TEST 1:

The first Tank 2 (R) test (10 inches down from top of fill pipe) was calibrated with a volume of 30 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line superimposition indicates a negative slope, equivalent to a product level loss of .022 gallons per hour. This level change is not within the acceptance criteria established above, therefore additional tests were run.

TANK 2, TEST 2:

The second test on Tank 2, Regular, was run 11 1/4 inches from the top of the fill pipe. The Tank 2, Test 2 was calibrated with a volume of 30 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line plot superimposition indicates a negative slope, equivalent to a product level change of .030 gallons per hour during the test procedure. This is not within the acceptance criteria established above.

TANK 2, TEST 3:

ATC protocol calls for additional testing by dropping product into the tank when leaks have been indicated while testing in the fill pipe. This third test on Tank 2 (R) was run on the tank only, one inch down from the top of the tank. This test was calibrated with a volume of 90 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line plot superimposition indicates no slope. That is, the total fluid level change was less than .001 gallons per hour during the test procedure. This is within the acceptance criteria established above.

REGULAR LINES:

The Tank 2 Regular lines were tested hydrostatically, in attempts to maintain pressure during the test phase. However, these Regular lines would not hold pressure for a time period long enough to compute a leak rate. Product was observed draining back into the tank when pressure was applied to the lines, indicating faulty check-valves.

TANK 3:

The Tank 3 (R) test was calibrated with a volume of 30 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line superimposition indicates a slight positive slope, equivalent to a product level change of .005 gallons per hour during the test period. This is within the acceptance criteria established above.

REGULAR LINES:

The Tank 3 Regular lines were tested hydrostatically, in attempts to maintain pressure during the test phase. However, these Regular lines would not hold pressure for a time period long enough to compute a leak rate. Product was observed draining back into the tank when pressure was applied to the lines, indicating faulty check-valves.

TANK 4:

Tank 4 is located close to the ground surface, having a fill pipe of only eight (8) inches in length. During the testing period, heavy equipment being used in close proximity to this tank caused some "noise" in the test results. The Tank 4 (D) test was calibrated with a volume of 30 ml. The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line superimposition indicates a slight positive slope, equivalent to a product level change of .004 gallons per hour during the test period. This is within the acceptance criteria established above.

CERTIFICATION

Based on the data and analysis provided in this report, we certify that Tank 1 (R), Tank 3 (R) and Tank 4 (D), at the Cortrim Hardwood Parts Company, 1320 Georgia Ave., Bristol, TN, are not leaking as of the date of testing (3/9/89). Test results on the Tank 2 system indicated leakage in the vent pipe, fill pipe, or tank bungs. The third test on this system indicated the tank itself to be tight. All line tests on the Regular tank systems indicated loss of pressure. Product was observed draining back into the tanks as pressure was applied to the lines, indicating that at least part of the problem may be faulty check valves. It is recommended that the Tank 2 system be repaired and retested for tightness. Further, it is suggested that all check-valves on the three regular tanks be repaired or replaced and the lines retested. It is also recommended that all tanks and lines be tested on a regular basis to recertify

tightness. The results and certification contained in this document are valid only at the date and time the tanks described above were tested (3/9/89), and no certification or representation is made with regard to the state of the tanks at any time or date thereafter.

Advanced Tank Certification

673 Emory Valley Road
Oak Ridge, Tennessee 37830
Phone: (615) 482-6901
1-800-365-TEST

PRECISION TANK TEST -- FIELD NOTES

Contact : Mr Spiegel
TANK LOCATION

Testing Work Order: B00062 Date: 03-13-1989

Cortrim Hardwood
1320 Georgia Av
Bristol , TN 37621

Test Performed By: MIKE WOOD
Van ID: car
Weather: clear 41F

TANK#	CAPACITY	TANK CONST.	PRODUCT	TIME OF LAST DELIVERY	GALLONS DELIVERED	TEST START	TEST END	PRELIMINARY INDICATIONS
4	20000	MET	DES	09:00	unk	07:30	08:30	PASS
Comment: 1st test Sin down in fill neck								

PASS - A leak is not indicated.

FAIL - Indicates that product loss rate during testing period was greater than or equal to 0.02 U.S. Gallons per hour.

* - Indicates that a product gain of greater than 0.02 U.S. Gallons per hour was measured.

N/A - Indicates that on-site analysis of the tank was not performed.

All indications are preliminary and subject to change when interpreted by the ATC Analysts.

NOTE : ATC will only certify tank surfaces AT or BELOW the product level at the time of the test. The certification contained in this document is valid only at the date and time the tanks described were tested, and no certification or representation is made with regard to the state of the tanks at any time or date thereafter.

[ATC 2.82] Ascii March 2, 1989

CORTRIM HARDWOOD PARTS COMPANY, BRISTOL, TENNESSEE

TEST RESULTS - TANK 5

INTRODUCTION

Advanced Tank Certification, Inc. (ATC) was retained by Cortrim Hardwood Parts Company to perform precision leak detection on four underground storage tanks and one above ground tank at their location on 1320 Georgia Ave., Bristol, TN. This report details the results of Tank 5 - the above ground tank (a mixture of water and Sodium Pentachlorophenate, a solvent used in Cortrim's wood treatment process). The results of the Tank 1 - 4 testing were provided in a separate report. The layout of this location is shown in the attached drawing (not to scale). Because this above ground tank or vat is entirely open at the top, slightly different procedures were used to test. These are described below under "Results". The tank dimensions were approximately 15 feet wide x 20 feet long x 84 inches deep. The level of the solvent and water mixture at the time of the test was 56 inches. Weather conditions on 3/9/89 at test time ranged from 32 - 55 degrees F. and clear.

RESULTS

Field notes and a graphical representation of the data for the tank leak detection are attached to this report.

TANK 5:

This tank was covered with foam insulation and plastic to help prevent rapid product evaporation. Wooden boards from Cortrim were placed along the top of the foam and plastic and the ATC equipment was placed on the boards in the corner of the tank. A five hour test was performed on this tank because of the large surface area.

The Tank 5 (Above ground - open vat) test was calibrated with a volume of 7000 ml (7 liters). The "peak" at the end of the horizontal plot represents the calibration volume. An analysis of this data using the straight-line superimposition indicates a positive slope, equivalent to a product level change of 1.022 gallons per hour. This is an increase of 0.01 % of the tank's contents. Ordinarily, this level change would not meet the acceptance criteria for certification established above. However, several variables must be considered in the

interpretation of these test results. First, it was noted that the boards on which the ATC probe sat visibly bowed during the five hour test, causing the probe to be very gradually lowered into the vat and to, therefore, measure a product rise. In addition, because the tank is primarily above ground, its contents are more vulnerable to expansion and contraction with the atmospheric temperature changes. During the test, the air temperature increased approximately 20 - 25 degrees, consequently increasing the volume of the tanks contents. Further, because the tank does not sit in the water table, it is highly unlikely that the increase in volume of tank contents could be due to in-leakage of water.

CERTIFICATION

Based on the data and analysis provided in this report, we certify that Tank 5 (Above ground vat containing a mixture of water and Sodium Pentachlorophenate), at Cortrim Hardwood Parts Company, 1320 Georgia Ave., Bristol, TN. is not leaking as of the date of testing (3/9/89). For the reasons described above and because this is an above ground tank containing an aqueous solution, we believe the results of this tank to be acceptable. It is recommended that all tanks and lines at this location be tested on a regular basis to recertify tightness. The results and certification contained in this document are valid only at the date and time the tanks described above were tested (3/9/89), and no certification or representation is made with regard to the state of the tanks at any time or date thereafter.

Advanced Tank Certification

673 Emory Valley Road
Oak Ridge, Tennessee 37830
Phone: (615) 482-6901
1-800-365-TEST

PRECISION TANK TEST -- FIELD NOTES

Contact : Bob Spiegall
TANK LOCATION

Testing Work Order: B00062 Date: 03-31-1989

Cortrim Hardwood
13020 Georgia Ave.
Bristol, TN 37620
Company Name:

Test Performed By:
Van ID:
Weather:

TANK#	CAPACITY	TANK CONST.	PRODUCT	TIME OF LAST DELIVERY	GALLONS DELIVERED	TEST START	TEST END	PRELIMINARY INDICATIONS
5					0			*
Comment: Test Analysis 03/31/89								

- PASS - A leak is not indicated.
 FAIL - Indicates that product loss rate during testing period was greater than or equal to 0.02 U.S. Gallons per hour.
 * - Indicates that a product gain of greater than 0.02 U.S. Gallons per hour was measured.
 N/A - Indicates that on-site analysis of the tank was not performed.

All indications are preliminary and subject to change when interpreted by the ATC Analysts.

NOTE : ATC will only certify tank surfaces AT or BELOW the product level at the time of the test. The certification contained in this document is valid only at the date and time the tanks described were tested, and no certification or representation is made with regard to the state of the tanks at any time or date thereafter.

[ATC 2.90] Ascii Feb. 28, 1989

Tank #151

Gallons

ATC Test Analysis 03/29/89

Cortrim Hardwood
13020 Georgia Ave.
Bristol, TN 37620

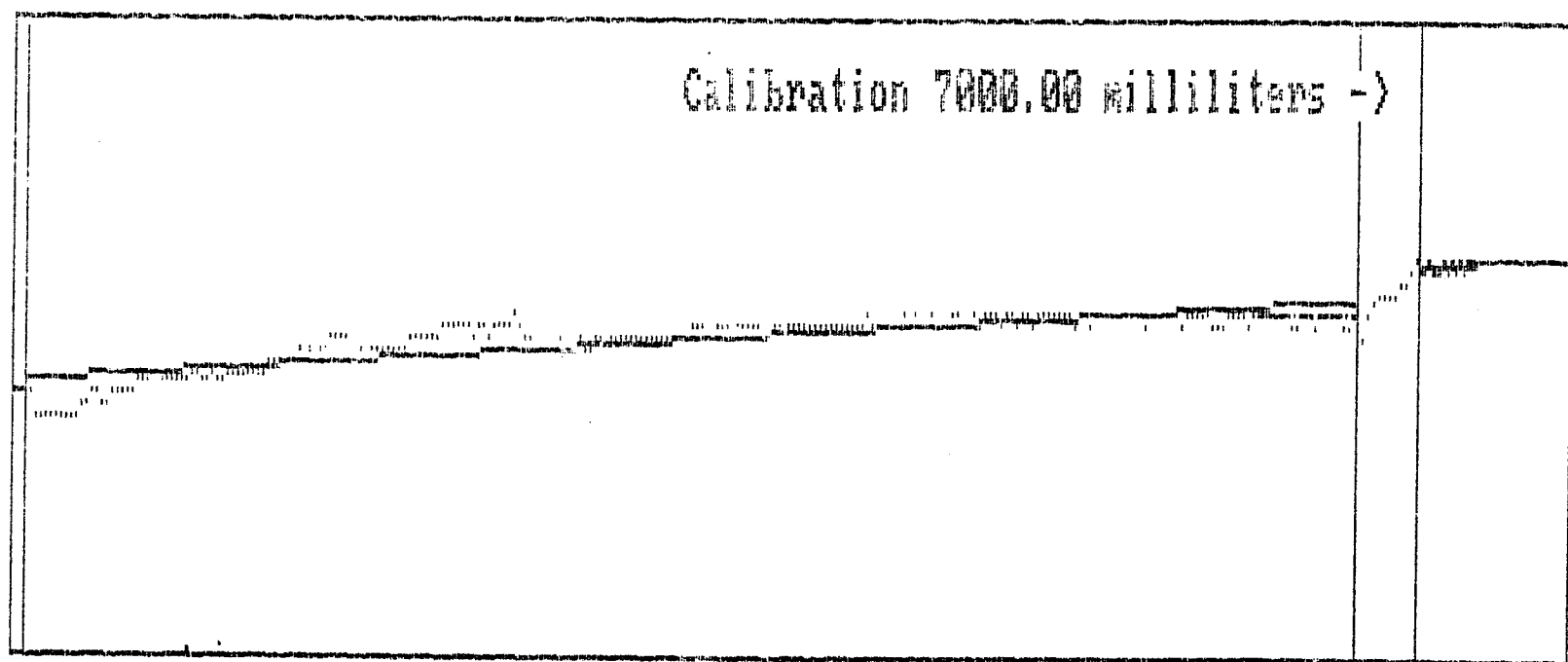
Comment : Test Analysis 03/31/89

Total Fluid Change 4.491 Gallons

Rate 1.022 Gal.s per Hour

Testing Period 263 minutes 45 sec.s

Work Order No.: B00062



0
Time in Minutes

76

153

230

306

CORTRIM HARDWOOD PARTS
PLANT

Office

Tank 4
(D)

20,000 gal
#2 oil

dispensars →



break
room

Maint.
Bldg.

Tank
3

Tank
2

Tank
1

Tanks 1, 2, & 3 = (R)

Tank 5
open
vat

creek

creek

Lakeview Street

Georgia Avenue

(not to scale)

3/9/89